TSD File Inventory Index

Date: February 11, 2005

Initial: CM Guerra

Facility Name	AGI, LLC (Melrose Park - One folder Site)
Facility Identification Number	ILD 047580 006

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Total - 1

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Note Transmittal Letter to Be Included with Reports.
Comments Documents do not justify individual folder per schedule.

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

FEB 4 1983

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Jack Cutchin, Vice President
Album Graphics Plant Incorporated
1950 North Ruby Street
Melrose Park, Illinois 60160

RE: Interim Status Acknowledgement USEPA ID NO. ILD047580006
FACILITY NAME: Album Graphics Plant Incorporated

Dear Mr. Cutchin:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Illinois has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in 35 Illinois Administrative Code, Subtitle G, Chapter I, Subchapter c, Part 725, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Illinois Environmental Protection Agency for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

If you have questions concerning the Illinois hazardous waste regulations, please contact Mr. Robert Kuykendall at the Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. His phone number is (217) 782-6760.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure
cc: Donald Kostebka, Album Graphics Plant Inc.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

20 JUL 1982

Mr. Jack Cutchin, Vice President
Album Graphics Plant Incorporated
1950 North Ruby Street
Melrose Park, IL 60160

RE: Request for Information--Hazardous Waste Permit Review (Small Quantity Generator)
FACILITY: NAME: Album Graphics Plant Incorporated
USEPA ID NO.: ILD 047 580 006

Dear Mr. Cutchin:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to qualify as a small quantity generator as defined in 40 CFR Part 261.5 (enclosed). Please review these requirements to determine if your facility qualifies as a small quantity generator from November 19, 1980, to the present. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation (1) did not qualify for the special requirements for generators, of small quantities of hazardous wastes, and (2) included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265 Subpart G.

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please do not hesitate to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Small Quantity Generator," in all telephone contacts and correspondence on this matter.

Sincerely, yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: Donald Kostebka

FACILITY NAME

ALBUM GRAPHICS PLANT, INCORPORATED

EPA ID NUMBER

ILD047580006

FACILITY OPERATOR

ALBUM GRAPHICS INCORPORATED

FACILITY OWNER

ALBUM GRAPHICS INCORPORATED

FACILITY LOCATION

1950 NORTH RUBY STREET
MELROSE PARK IL 60160

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	3300	G

--------- KEY ----------

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G or L
TANK	S02	G or L
WASTE PILE	S03	Y or C
SURFACE IMPOUNDMENT	S04	G or L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, or V
LANDFILL	D80	A or F
LAND APPLICATION	D81	B or Q
OCEAN DISPOSAL	D82	U or V
SURFACE IMPOUNDMENT	D83	G or L
TREATMENT:		
TANK	T01	U or V
SURFACE IMPOUNDMENT	T02	U or V
INCINERATOR	T03	D,W,E, or H
OTHER	T04	U,V,J,R,N, or S

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS/HOUR	W
GALLONS/HOUR	E
LITERS/HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS/HOUR	J
KILOGRAMS/HOUR	R
TONS PER DAY	N
METRIC TONS/DAY	S

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

RECEIVED
JUN 21 1999
Date Received (For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. Initial Notification ☒ B. Subsequent Notification (Complete item C)

C. Installation's EPA ID Number: ILD047580006

II. Name of Installation (Include company and specific site name)

AGI INCORPORATED - MELROSE

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street: 1950 NORTH RUBY STREET

RECEIVED
JUN 15 1999
EPA/BOL

Street (Continued):

City or Town: MELROSE PARK | State: IL | Zip Code: 60160-1178

County Code: 031 | County Name: COOK

IV. Installation Mailing Address (See instructions)

Street or P.O. Box: SAME

City or Town: | State: | Zip Code:

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last): LISAC | (First): RICHARD

Job Title: EH+S MANAGER | Phone Number (Area Code and Number): 708-344-9100

VI. Installation Contact Address (See instructions)

A. Contact Address Location: ☒ Mailing: ☐ | B. Street or P.O. Box:

City or Town: | State: | Zip Code:

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner: AGI INCORPORATED

RECEIVED
JUL 29 1999
RCRA Records Center
Waste, Pesticides & Toxics Division
EPA - REGION 5

Street, P.O. Box, or Route Number: 1950 NORTH RUBY STREET

City or Town: MELROSE PARK | State: IL | Zip Code: 60160-1178

Phone Number (Area Code and Number): 708-344-9100 | B. Land Type: P | C. Owner Type: P | D. Change of Owner Indicator: Yes ☐ No ☒ | (Date Changed) Month Day Year:

7/20/99 dk

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 10/31/99
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
   - [X] a. Greater than 1000kg/mo (2,200 lbs.)
   - [ ] b. 100 to 1000 kg/mo (220-2,200 lbs.)
   - [ ] c. Less than 100 kg/mo (220 lbs)
2. Transporter (Indicate Mode in boxes 1-5 below)
   - [ ] a. For own waste only
   - [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify

3. [ ] Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Hazardous Waste Fuel
   - [ ] a. Generator Marketing to Burner
   - [ ] b. Other Marketers
   - [ ] c. Boiler and/or Industrial Furnace
     - [ ] 1. Smelter Deferral
     - [ ] 2. Small Quantity Exemption

   Indicate Type of Combustion Device(s)
   - [ ] 1. Utility Boiler
   - [ ] 2. Industrial Boiler
   - [ ] 3. Industrial Furnace
5. [ ] Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Recycling Marketer
   - [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device
   - [ ] a. Utility Boiler
   - [ ] b. Industrial Boiler
   - [ ] c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Combustion Device(s)
   - a. Transporter
   - b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Process
   - [ ] b. Re-refine

IX. Description of Regulated Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
X	X		X	D007 D011 D035

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F003	F005				
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
Richard J. Lisac	Richard J. Lisac EH+S Manager	6/7/99

XI. Comments

Request for change in waste activity status.

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD047580006 REACKNOWLEDGEMENT

ALBUM GRAPHICS INCORPORATED
1950 RUBY ST
MELROSE PARK IL 60160

INSTALLATION ADDRESS ➤

1950 RUBY ST
MELROSE PARK IL 60160

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
OMB No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

CORRECTION

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C (see back)

INSTALLATION'S EPA I.D. NUMBER: S F 1 | APPROVED | DATE RECEIVED (yr., mo., & day): [redacted]

I. NAME OF INSTALLATION

ALBUM GRAPHICS INCORPORATED PLANT

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: C 3 1950 N. RUBY ST.

CITY OR TOWN: C 4 ELROSE PARK | ST.: IL | ZIP CODE: 60160

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: C 5 1950 N. RUBY ST

CITY OR TOWN: C 6 ELROSE PARK | ST.: IL | ZIP CODE: 60160

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): C 2 CUTCHIN JACK VICE-PRESIDENT | PHONE NO. (area code & no.): 312-394-9100

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: C 8 ALBUM GRAPHICS PLANT INC

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): F = FEDERAL, M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: ILD047580006

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

SEP 8 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S W | 1 2 - 13 | 14 15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8		10		12

VOIDED

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Stanley C. Whalen	Vice-President/Plant Mgr.	9-8-80

EPA Form 8700-12 (6-80) REVERSE

SMALL QUANTITY GENERATOR

HAULER WANTS NUMBER

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

Change Made 4-22-81
Small Qnty Gen. 7 11

PLEASE PLACE LABEL IN THIS SPACE

000160 AUG 12 80

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
ILD047580006 T/A C	A	800812

I. NAME OF INSTALLATION

ALBUM GRAPHICS INCORPORATED

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 1950 RUBY ST.

CITY OR TOWN	ST.	ZIP CODE
MELROSE PARK	IL	60160

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 1950 RUBY ST.

CITY OR TOWN	ST.	ZIP CODE
MELROSE PARK	IL	60160

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
CUTCHIN JACK VICE PRESIDENT	312-344-9100

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: ALBUM GRAPHICS INCORPORATED

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: F = FEDERAL; M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

7 11

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD047580006

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

AUG 11 1980

CONTINUE ON REVERSE

FOR OFFICIAL USE ONLY

W I L D 0 4 7 5 8 0 0 0 6 2 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [ ] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Stanley C. Whalen	Vice-President/Plant Manager	8-8-80

Please print or type in the unshaded areas only (fill–in are[illegible] re spaced for elite type, i.e., 12 ch[illegible]ters/inch).

Form Approved OMB No. 15[illegible] R0175

FORM 1 GENERAL | **EPA** | U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F ILDØ47580406 3 D

LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill–in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill–in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold–faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge to waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge to waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges to waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge to waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ALBUM GRAPHICS PLANT INC.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 CUTCHIN JACK VICE-PRESIDENT	312 344 91ØØ

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 195Ø N. RUBY ST.

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 MELROSE PARK	IL	6Ø16Ø

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 195Ø N. RUBY ST.

B. COUNTY NAME

COOK

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 MELROSE PARK	IL	6Ø16Ø	Ø31

EPA Form 3510-1 (6-80) NOV 17 1980 CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2751 (specify) Commercial Printing - Letter Press	2782 (specify) Commercial Printing - Litho-Graphic

C. THIRD	D. FOURTH
(specify) NA	(specify) NA

VIII. OPERATOR INFORMATION

A. NAME: ALBUM GRAPHICS PLANT INC

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
P (specify) NA

D. PHONE (area code & no.): 312 344 9100

E. STREET OR P.O. BOX: 1950 N. RUBY ST.

F. CITY OR TOWN: MELROSE PARK

G. STATE: IL

H. ZIP CODE: 60160

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N NA	9 P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U NA	9 19 26 46 (specify) ILL. EPA. LISCENSE

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R NA	9 19 26 47 (specify) ILL. EPA LISCENSE

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

FQ: A/50

XII. NATURE OF BUSINESS (provide a brief description)

PRINTING, CUTTING, FOLDING, GLUEING OF RECORD ALBUM COVERS PERFUME CARTONS AND OTHER VARIOUS PRINTED MATTER.

FQ: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
JOHN H COTOHIN V.P. MFG.	John H Cotohin	11-13-8

COMMENTS FOR OFFICIAL USE ONLY

ILLINOIS EPA
Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153
312/345-9780

682

Re: General - Cook County - Melrose Park/Album Graphic
USEPA No. ILD047580006

March 29, 1982

Albuum Graphics
1950 Ruby Street
Melrose Park, Illinois 60160

Dear Mr. Cutchin:

Because you notified the USEPA of hazardous waste activities at your facility, the Illinois Environmental Protection Agency, under authorization of the USEPA, conducted an inspection of your facility on March 10, 1982. This inspection found that the USEPA hazardous waste regulations apparently do not now apply to your facility. Therefore, the Agency is recommending that you request in writing, within thirty days of the date of this letter, to be deleted from the hazardous waste facility list. Please submit your request to:

Illinois Environmental Protection Agency
Division of Land/Noise Pollution Control
1701 South First Avenue - Suite 600
Maywood, Illinois 60153

Attention: Kenneth P. Bechely,
Northern Region Manager

Be sure to include your notification number (shown above) on all correspondence with the Agency.

Although it appears you currently are not required by specific USEPA hazardous waste regulations, subsequent RCRA revisions may apply to facilities such as yours as well as future State regulations. And, of course, you must ensure that any waste your facility produces or handles is stored, transported and disposed of in a safe, environmentally sound manner.

Sincerely,

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control

KPB:JPE:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
F | | | | | | | | | | | | 1

454

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C 8 | YR. 71 | MO. 10 | DAY 15 — FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR. NA | MO. NA | DAY — FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.
1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C | DUP | 3 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	3,300 (GAL PER YEAR)	G		7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")* FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158S-0004

EPA I.D. NUMBER (enter from page 1)			FOR OFFICIAL USE ONLY		
W		1	W	DUP	2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1		(NA) this Section			
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					See Reverse →
25					
26					

LOW RISK, (ILLINOIS EPA LISTED - Specific) SMALL QUANTITY GENERATOR

WASTE HAULER NUMBER

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

Waste Contains:

PPM		PPM	
0.1	AS	0.1	AS
0.2	CR	0.1	CD
0.7	CU	0.2	CR
0.1	Ni	0.3	CU
3.0	PB	0.2	Ni
1.4	ZN	0.2	PB
		1.2	ZN

for UV Coating waste

for Waterbase Coating waste

these figures are from our ILL. EPA. License (renewed Oct. '80)

EPA I.D. NO. (enter from page 1)

F | | T/A C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 54 30 0	087 52 30 0

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
NA	NA

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
NA	NA	NA	NA

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

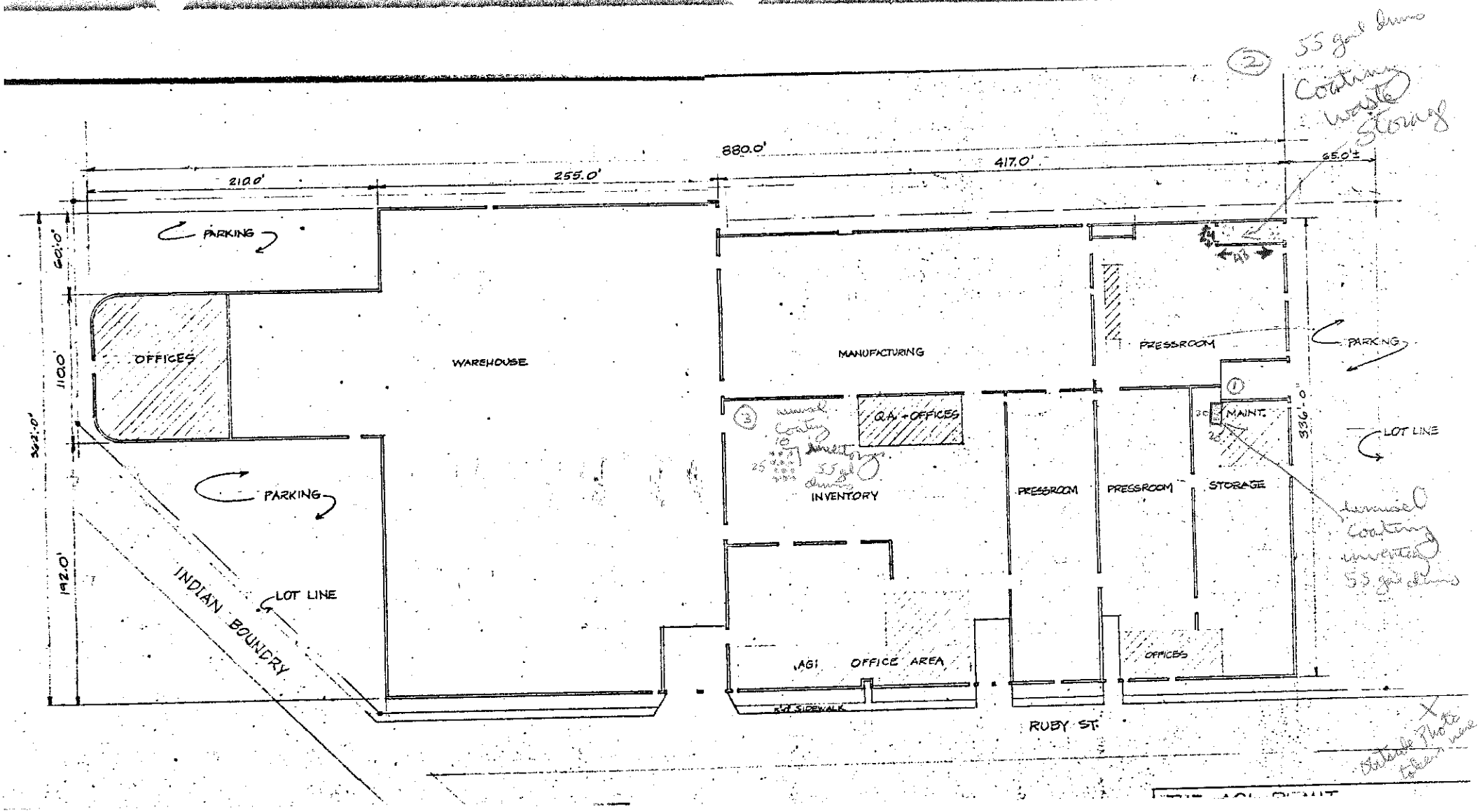
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
DON KOSTEBBA	[signature]	11-17-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
JOHN H CUTCHIN	John H Cutchin	11-13-80

CONTINUE ON PAGE 5


55 gal drums
Coating waste storage
880.0'
417.0'
255.0'
210.0'
65.0'±
60.0'
110.0'
322.0'
192.0'
PARKING
OFFICES
WAREHOUSE
MANUFACTURING
PRESSROOM
PARKING
MAINT.
336'-0"
LOT LINE
Q.A. + OFFICES
INVENTORY
PRESSROOM
PRESSROOM
STORAGE
Terminal Coating converted 55 gal drums
PARKING
INDIAN BOUNDRY
LOT LINE
AGI OFFICE AREA
OFFICES
5'-0" SIDEWALK
RUBY ST.
Outside Photo taken here
N

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

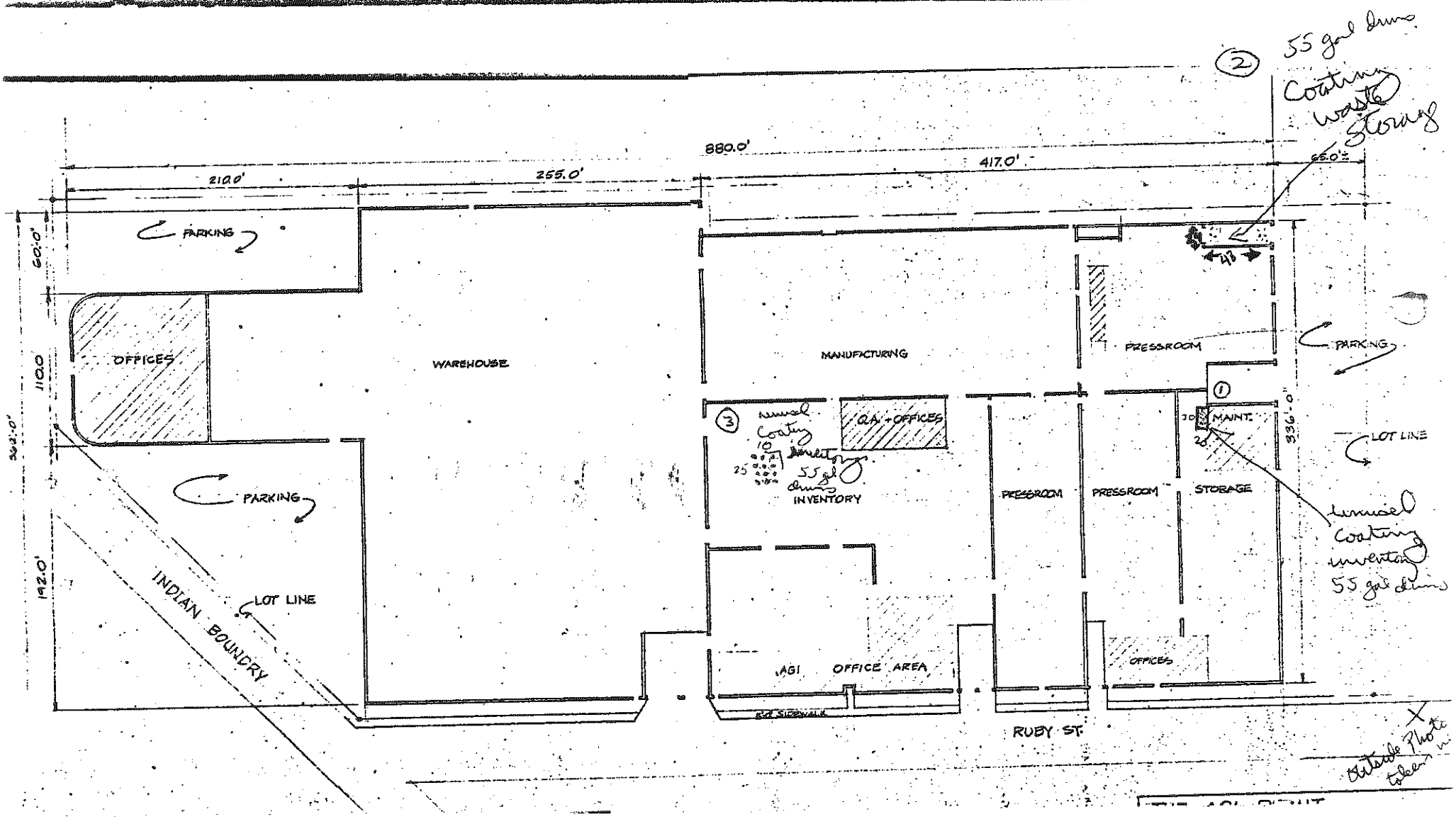
Closure Certification Statement

Closure Log C-637

The hazardous waste management SOl unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name
Signature of Owner/Operator Date	Name and Title
Signature of Registered P.E. Date	Name of Registered P.E. and Illinois Registration Number
Mailing Address of P.E.:	

LWE:GS:lat/72Y,9


2
55 gal drums
Coating waste Storage
880.0'
417.0'
255.0'
210.0'
66.0'±
4'
PARKING
60.0'
OFFICES
WAREHOUSE
MANUFACTURING
PRESSROOM
PARKING
1100
3
Aerosol Coating
10
25
55 gal drums
INVENTORY
QA + OFFICES
1
30
20
MAINT.
336'-0"
LOT LINE
PRESSROOM
PRESSROOM
STORAGE
Aerosol Coating inventory 55 gal drums
PARKING
192.0'
INDIAN BOUNDRY
LOT LINE
AGI OFFICE AREA
OFFICES
8'd SIDEWALK
RUBY ST.
Outside Photo taken in
N

A.4 Closure/ Post-Closure

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

A.4.1

August 2, 1994

Tony Emerson
AGI Incorporated
1950 North Ruby Street
Melrose Park, Illinois 60160-1178

Re: 0311865007 -- Cook County
AGI Incorporated
ILD047580006
Log No. C-637-M-1
Received: July 11, 1994

Dear Mr. Emerson:

The closure plan modification request by AGI, Incorporated dated June 30, 1994 and received July 11, 1994 pertaining to RCRA closure of one container storage area at the above-referenced facility has been reviewed by the Agency. The request to provide a report documenting all closure activities to date at the site and to include a Sampling and Analysis Plan to the Agency is hereby approved. The report must be submitted to the Agency by August 15, 1994. As such, closure activities must be completed by January 1, 1995 and certification of closure must be submitted to the Agency by March 1, 1995. Otherwise, closure of the subject units must be carried out in accordance with the procedures set forth in the Agency's April 14, 1994 closure plan letter (Log No. 637-M-1).

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3300.

Sincerely,

Douglas W. Clay, P.E.
Hazardous Waste Branch Manager
Permit Section, Bureau of Land

DWC:GS:lo/0446W/10
JKH
cc: USEPA Region V - George Hamper

USEPA

State of Illinois
ENVIRONMENTAL PROTECTION AGENCY
217/524-3300

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

A.A.I.

February 8, 1993

Mr. Tony Emerson
AGI, Incorporated
1950 Ruby Road
Melrose Park, Illinois 60160

Re: 0311865007-- Cook County
AGI, Incorporated
ILD047580006
RCRA Closure
Log No. 637
Received: December 10, 1992

Dear Mr. Emerson:

The report entitled (Revised) Closure Plan For AGI, Incorporated, Subject Property, 1950 Ruby Road, Melrose Park, Illinois, prepared by Environmental Risk Consultants, Inc., has been reviewed by this Agency. The final closure plan for the one hazardous waste container (S01) storage area at the above-referenced facility referred to in figure ERC # 478-010A as the "Drum Storage Area" is hereby approved subject to the following conditions and modifications:

1. Closure activities must be completed by August 15, 1993. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by October 15, 1993. These dates may be revised if AGI Corporation finds that additional time is necessary to complete all required closure activities and AGI Corporation demonstrates to the Agency that it is attempting to complete closure in a timely manner.

   The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

   The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the

State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

To document the closure activities at the subject facility, a Closure Documentation Report must be submitted along with the closure certification which contains:

a. The volume of waste, waste residue and contaminated soil (if any) removed, including wastes resulting from decontamination activities. Actual disposition of this waste must also be described;

b. Scaled drawings showing the horizontal and vertical boundaries from which any contaminated soil was removed;

c. A description of the method of waste handling and transport;

d. Waste manifest numbers;

e. Copies of the waste manifests;

f. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information;

g. A chronological summary of closure activities and the cost involved;

h. Color photo documentation of the subject area/activities before, during and after closure; and

i. Tests performed, methods and results; and

j. Information documenting the results of all soil sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:

    1. Identification of the reason for the sampling/analysis effort and the goals of the effort;

    2. A summary in tabular form of all analytical data, including all quality assurance/quality control data;

3. A scaled drawing showing the horizontal location from which all soil samples were collected;

4. Identification of the depth and vertical interval from which each sample was collected;

5. A description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;

6. Identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;

7. Copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance data;

8. Visual classification of each soil sample in accordance with ASTM D-2488;

9. A summary of all procedures used for quality assurance/quality control; including the results of these procedures; and

10. A discussion of the data, as it relates to the overall goal of the sampling/analysis effort.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control -- #33
Permit Section
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

2. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 IAC 725.211, the Agency reserves the right to amend the closure plan. Revisions of the closure plan are subject to the provisions of Section 40 of the Illinois Environmental Protection Act.

3. If contamination is detected, the Agency must be notified in writing within fifteen (15) days. A revised closure plan addressing remediation of the contamination detected must be submitted within timeframes established by the Agency.

4. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring,

decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

5. An independent registered professional engineer shall inspect the integrity of the concrete/asphalt pad and any related nearby discharge drains, sewer inlets, construction joints, and secondary containment structures or drainage pathways within the subject closure areas or extending from the subject closure areas. This inspection should be carried out in accordance with standards and recommendations of professional/technical entities such as the American Concrete Institute, the Portland Cement Association, the American Society for Testing and Materials, the American Society of Civil Engineers, etc. as they relate to the ability of concrete structures to contain liquids.

   A report documenting the results of this inspection must be included in the closure certification report required by Condition 1 above. This report must include the following information:

   a. The results of the inspection;

   b. Scaled drawings showing the location of all cracks and construction joints observed during the inspection;

   c. Scaled drawings with arrows that indicate sloping directions on both pads to demonstrate the flow patterns should spills occur. These drawings should easily be cross-referenced with the scaled drawings of Condition 5 item b;

   d. Scaled drawings that indicate any repair work conducted upon the concrete/asphalt pad where past defects could have potentially allowed migration of hazardous waste or hazardous constituents. These drawings should easily be cross-referenced with the scaled drawings of Condition 5 item b;

   e. Conclusions reached from the inspection regarding the potential for hazardous wastes and/or constituents to migrate through any cracks, construction joints, etc. observed in the areas of concern; and

   f. Justification for the conclusions reached from the inspection (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight).

6. A scaled drawing must be provided that shows the piping locations extending from each indoor chemical storage area leading to the "Old Chemical Discharge Drain" referred to in figure ERC # 478-010A of the subject closure plan. This drawing must be easily cross-referenced with the scaled drawings required by Condition 5 and included within the report required by Condition 5.

7. The concrete/asphalt base of the container storage area shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete/asphalt surface must be steam cleaned and triple rinsed. All wash and rinse waters must be properly contained to avoid the possibility of contaminating nearby areas to the subject closure area. All wash and rinse water shall be collected. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. At a minimum, this material must be managed as a special waste in accordance with 35 IAC 809.

8. All equipment/devices involved in the closure of the storage area shall be steamed cleaned and tripled rinsed.

9. Cloths, personal protection clothing, etc. used during closure activities shall be disposed of as a special waste.

10. During decontamination of the container storage area, structural containment must be provided for the wash and rinse liquids. A description of such containment structures must be provided within the report required in Condition 1 of this letter.

    If any absorbing material used for containment during decontamination activities becomes soaked and the wash/rinse water is found to be hazardous waste, then the material must be analyzed to determine if it exhibits any characteristic of hazardous waste. Such material must then be managed as a hazardous waste or a non-hazardous special waste.

11. If joints, cracks, defects, or evidence of past defects, are found in the asphalt/concrete base, during the inspection required by Condition 5 above, which would potentially allow hazardous waste or hazardous constituents to migrate through them, then soil samples must be collected from beneath them to determine if hazardous waste or hazardous constituents have been released to the underlying soil. This sampling/analysis effort shall be carried out in accordance to the below listed procedures:

    a. Samples must be collected from at least one location along each joint, crack, or past defect that provided a potential for hazardous waste or hazardous constituents to migrate to underlying soil. Such locations shall be biased to stained areas or low-lying areas where spills would tend to accumulate.

b. The procedures used to collect and analyze all samples shall be carried out in accordance with the procedures approved by this letter.

c. Samples shall be collected from 0"-6" and from 18"-24" below the subgrade/natural soil interface at each sampling location.

12. Samples must be collected from a minimum of two locations beside each pipe connecting drainage from each indoor chemical storage room to the "Old Chemical Discharge Drain" beneath the concrete/asphalt pad of the subject storage area. These locations shall be approximately 5' from the east and west sides of the wall separating the "Drum Storage Area" and the indoor chemical storage rooms. Samples shall be collected from 0"-6" and from 18"-24" below the subgrade/natural soil interface at each sampling location.

13. Samples must be collected from a minimum of ten locations from the area surrounding the concrete/asphalt pad where hazardous waste could have drained or spilled from the locations of the asphalt/concrete pad. These locations should be approximately 20' apart. Horizontal placement for these samples shall be biased however to areas that appear to be drainage pathways, discolored from surrounding soil, stained, etc. where spills would tend to accumulate. Each location shall be within one (1) foot of the concrete/asphalt pad.

    Soil samples must be collected from the one location in the area directly south of the concrete pad. This location should be approximately in the middle of the southern edge of the pad and approximately one (1) foot south of the pad. The actual horizontal placement of this location shall be biased, however , to a location that appears to be a drainage pathway, discolored from surrounding soil, stained, etc. where spills would tend to accumulate.

    Soil samples must be collected from the grassy area directly west of the "Drum Storage Area" as shown in Drawing ERC # 478-010A.

14. Samples must be collected from 0"-6" and 18"-24" at each location identified in Condition 13 above.

15. All soil samples required to be collected in Conditions 11 thru 13 above must be analyzed for:

    a. Volatile organic compounds using Method 8240 in Test Methods for Evaluating Solid Wastes, Third Edition, including Final Update 1 (SW-846). The Practical Quantitation Limits (PQLs) set forth in Table 1 of Method 8240 must be achieved in these analyses and all constituents identified in this table must be analyzed for;

b. Arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver using the TCLP test described in Method 1311 of SW-846; and

c. Additional analytical methods must be utilized as necessary to ensure that the detection limits achieved during the analysis are equal to or below the clean-up objectives established in Condition 17 below.

16. Quality assurance/quality control procedures meeting the requirements of SW-846 must be implemented during all required soil sampling analysis efforts.

17. To ensure the closure performance standards of 35 IAC 725.211 and 725.214 are met, all soil samples collected from the soil which will remain beneath and around the container storage area must meet the below clean-up objectives. The objectives listed for the metal constituents are based upon the analysis of the extract of the TCLP test described in Method 1311 of SW-846.

Constituent	Soil Objective (mg/l)
Inorganics	
Metals	
Arsenic	.05
Barium	2.0
Cadmium	.005
Chromium	.1
Lead	.0075
Mercury	.002
Selenium	.05
Silver	.05
Organics	(mg/kg)
Acetone	.7
Benzene	.005
Carbon Tetrachloride	.005
Chloroform	.00002
Chlorobenzene	.1
1,1-Dichloroethylene	.007
cis-1,2-Dichloroethylene	.07
trans-1,2-Dichloroethylene	.1
1,2-Dichloroethane	.005
1,1-Dichloroethylene	.007
1,1-Dichloroethane	.7
Ethyl benzene	.7
Methylene Chloride	.0002
Methyl Ethyl Ketone	.1
Tetrachloroethylene	.005
Trichloroethylene	.005
1,1,1-Trichloroethane	.2
Toluene	1.0
Vinyl Chloride	.002
Xylene	10.0

To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15.

18. All soil samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with SW-846 and Attachment 7 to this Agency's closure plan instruction package. When a SW-846 analytical method is specified, all chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency.

    When visually discolored or contaminated materials exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed.

19. If the results of the soil sampling/analysis efforts required by Conditions 11 thru 13 above exceed the clean-up objectives established in Condition 17 above, then a sufficient number of additional samples should be collected and analyzed to clearly determine the horizontal and vertical limits of the soil which exceed the established cleanup objectives in and around the until undergoing closure. The procedures used to determine the vertical location of these additional samples should meet the requirements of Sections 13.a and 13.b of the Agency's RCRA closure plan instructions (revised December 1990). The procedures used to collect and analyze these samples must be in accordance with those approved by this letter. However, no random sampling shall be conducted.

20. The Agency shall be notified in writing if at any time contaminants not listed in Condition 17 are detected above their respective practical quantitation limits. This notification shall identify the additional constituents detected and the concentration at which they were detected. The Agency will review this information and establish cleanup objectives for the newly detected contaminants, if necessary. <u>The sampling analysis effort being carried out to determine the extent of contamination shall not be delayed while the Agency is reviewing this information</u>.

21. Contaminated soil may be excavated and disposed off-site at any time during closure. The goal of any such effort should be to remove all soil which exceeds the established cleanup objectives.

22. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavate hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.

23. If soil excavation is the chosen remedial action for any soil contamination encountered, then soil samples must be collected for analysis from the bottom and sidewalls of the final excavation from which contaminated soil was removed. This sampling and analysis effort must be (1) sufficient to demonstrate that the remaining soil meets the established cleanup objectives and (2) carried out in accordance with the following procedures.

    a. A grid system as set forth in Section 13.b of the Agency's closure plan instructions must be established over the excavation.

    b. Samples must be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.

    c. Samples must be collected 6"-12" from the top of the excavation wall at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.

    d. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.

    e. Soil samples which must be analyzed for volatile organic compounds shall be collected using Attachment 7 of the Agency's RCRA closure plan instructions. In additional, such samples must be collected 6"-12" beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.

    f. No random sampling shall be conducted to verify that the cleanup objectives have been met.

24. If soil excavation is the chosen remedial action for any solid contamination encountered, then additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with the conditions of this letter.

25. All contaminated soil which is excavated for off-site disposal must be managed as a hazardous waste in

accordance with 35 IAC 722, 723, 728, and 809, as well as all applicable federal requirements.

26. Should AGI Corporation decide to scrap the pad utilized to store hazardous waste, then the top of the pad must be cleaned in accordance with Condition 7 of this letter. The bottom of the concrete/asphalt pad shall be scraped and/or brushed to remove all material adhering to it. Once the top and bottom of the concrete/asphalt pad has been cleaned in accordance with these procedures, the pad may be disposed as construction debris.

27. If AGI Corporation determines that soil excavation and off-site disposal is not the preferred remedial action for any contaminated soil encountered during the required closure activities, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide AGI Corporation with additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.

28. The Agency must be notified in writing if, at any time, it is found that soil contamination extends to near the water table. This notification must be made within 15 days after such a discovery is made. A plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval within sixty (60) days after the initial written notification is submitted to the Agency.

29. If groundwater is encountered during the soil sampling activities prior to reaching soil which meets the cleanup objectives, a plan to investigate for potential groundwater contamination must be submitted within sixty days after the date that the analytical results are received which indicate that soil contamination extends to the water table. In addition, the Agency shall be notified in writing of this discovery within five (5) days after these analytical results are received.

30. To properly establish background levels a minimum of ten samples must be collected and analyzed from areas unaffected by the facility's operations. Background soil samples are not required, but if you desire them, then a minimum of ten (10) are required from each soil horizon of concern to establish cleanup objectives. The Agency must approve the location where these samples are to be collected and the actual analytical interpretation of the results for use as cleanup objectives.

    Include in any proposal for background soil samples the following information (at a minimum):

    a. A scaled drawing(s) showing each soil sampling location;

    b. Justification that the proposed sample locations are

in areas unaffected by the operations of the facility;

c. The depth of each sample, parameters to be analyzed for, and the analytical methods to be used;

d. The procedures to be used in collecting the samples; and

e. The statistical method to be used to analyze the data. An acceptable method can be found in Chapter 9, Table 9-1 Equation 6 of Test Methods for Evaluating Solid Wastes, Third Edition (SW-846).

31. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

32. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

    Facility Reporting Unit
    Division of Land Pollution Control
    Illinois Environmental Protection Agency
    P.O. Box 19276
    Springfield, Illinois 62794-9276

33. A February 5, 1993, telephone conversation between you and Mr. Gregg Sanders of my staff confirmed that AGI Corporation intends on being a large quantity generator storing less than 90 days.

Should you have any questions regarding this matter, please contact Gregg Sanders at 217/524-3300.

Very truly yours,

Lawrence W. Eastep by JKM

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control
Bureau of Land

LWE:MGS:mgs

Attachments: Closure Certification Statement

Soil Volatile Sampling Procedures

RCRA Closure Plan Instructions

Guidance on Site-Specific Soil Cleanup Objectives

Guidance for Establishing the Basis for Cleanup Objectives

cc: USEPA Region V -- George Hamper
Environmental Risk Consultants

P4866526116

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0311860019-- Cook County
Album Graphics
ILD047580006
RCRA - Permits

May 6, 1988

Album Graphics
1950 Roby Street
Melrose Park, Illinois 60160

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the rgistered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9878.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JRH:mmb/1203j/1204j/

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V

C.2 Compliance/ Enforcement

STATE IDENTIFICATION NUMBER
(If Applicable)

ILD047590006
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: Album Graphics Plant Inc

(B) Street: 1950 Ruby Street

(C) City: Melrose Park (D) State: Il (E) Zip Code: 60160

(F) Phone: 312-349-9100 (G) County: Cook

(H) Date of Inspection: 3-10-82 Time of Inspection (From) 1:30p (To) 2:15p

(I) Weather Conditions: Sunny ~37°

(J) Person(s) interviewed	Title	Telephone
Jack Cutchin	V.P.	349-9100

(K) Inspection Participants	Agency/Title	Telephone
J. Evans	IEPA/E.P.S.	345-9780

(L) Preparer Information

Name	Agency/Title	Telephone
J. Evans	IEPA/E.P.S.	345-9780

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

Inspections consists of pages 28, 29 and 36

Rev. 1-27-81/J.B.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Album Graphics is engaged in printing, cutting, folding and glueing of paper/cardboard packaging. (I.E. Album cakes, + perfume cartons)

III. MANIFEST REQUIREMENTS
(Subpart B)

		Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review?	___	___	___	_____
(B)	Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
	1. Manifest document number?	___	___	___	_____
	2. Name, mailing address, telephone number, and EPA ID number of generator?	___	___	___	_____
	3. Name and EPA ID Number of transporter(s)?	___	___	___	_____
	4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	___	___	___	_____

*Not Inspected

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:

   a. Notified the Administrator in writing? ___ ___ ___ _____

   b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? ___ ___ ___ _____

   c. Met the Manifest requirements? ___ ___ ___ _____

2. Importing Hazardous Waste, has the generator:

   Met the manifest requirements? ___ ___ ___ _____

VIII. Remarks

REMARKS: Album Graphics has submitted A Notification and Part A Application to the U.S. E.P.A; however Album Graphics doesn't generate ANY HAZARDOUS WASTES. Album Graphic has two waste streams: WATER BASE Acrylic Emulsion and A ultra violet curable Acrylate, both NON-HAZARDOUS special wastes that are permitted for disposal at either L.S.L or C I D. Since Album Graphic doesn't generate any haz-waste they should with draw their Notification and PART A Application.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: _____ DATE: _____

FROM: _____ ☐ Information only

SUBJECT: _____ ☐ Response requested

ILD047580006

D. Corrective Action

Determination: Soil sampling

PA/VSI Or RFA FILE REVIEW CHECKLIST

Facility Name: Meadwestvaco (AGI, LLC)_____

EPA ID: ILD 047 580 006_____ City: Melrose Park_____ State: IL___

Name of Reviewer: Maureen McHugh_____ Date of Review: 8/1/08_____

1	Yes	No	Is this a one folder site?
2	Yes	No	Are there Superfund files for this site?
3	Yes	No	Did you Read the Executive Summary?
			There are: __9__ SWMUs and ___0__ AOCs at this site.
4	Yes	No	Did you review the regulatory history?
5	Yes	No	Does the facility have interim status or a permit?
			This facility is a: ____ SQG, __X___ LQG, or ____ Less than 90 day.
6	Yes	No	Was the Facility closed per RCRA? RCRAInfo 380 (1996)
			If Yes, was the closure: __X__ CC, or _____ CIP.
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.
8	Yes	No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	Yes	No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

__X___No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

_____ Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

_____ More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

Several USTs were abandoned in place with approval from the IEPA. Contaminants were detected in some samples, but at levels below cleanup objectives.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

PA/VSI Recommendations

Soil sampling at the drum storage pad- it is upgradient of the slope that leads to railroad tracks and stored drums with an unknown substance outdoors on an uncurbed asphalt pad.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

AGI, INC.
MELROSE PARK, IL
ILD 047 580 006

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 047 580 006
Date Prepared	:	March 1, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL2A
Prepared by	:	B&V Waste Science and Technology Corp. (Michael Eng, Anil Saxena, and Margie Casserly)
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Dennis McGuinn
Director of Human Resources
AGI, Inc.
1950 North Ruby Street
Melrose Park, Illinois 60160

Re: Visual Site Inspection
AGI, Inc.
Melrose Park, Illinois
ILD 047 580 006

Dear Mr. McGuinn:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

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EXECUTIVE SUMMARY

B&V Waste Science and Technology Corp. (BVWST), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the AGI Inc. (AGI), facility in Melrose Park, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The AGI facility manufactures folding cartons, primarily for record, compact disc, and cassette tape covers and cosmetic product packaging. The facility generates and manages the following waste streams: paper (non-hazardous), ink (D001), water/alcohol mixture (D001), lubricating oil (D001), press "washups" (D001), still bottoms (D001), water-based coatings (D001), ultra-violet coatings (D001), and adhesives (D001).

AGI, now owned by Ruby North Partnership who purchased AGI in a leveraged buy-out in 1987, purchased the facility in 1971 from the Baungarten Calendar Co. Baungarten had operated at the site since 1958. The facility occupies approximately six acres in an industrial area and employs about 360 people.

The facility's regulatory status is that of a large-quantity generator and a treatment/storage/disposal (TSD) facility. AGI does not currently store hazardous wastes for longer than 90 days and has hired Environmental Risk Consultants Inc. to compile a closure plan for submittal to Illinois Environmental Protection Agency (IEPA), terminating the facility status as a TSD facility.

The PA/VSI identified the following nine SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Waste Paper Collection Area
2. Paper Waste Storage Room
3. Waste Ink Satellite Accumulation Area
4. Printing Press Satellite Accumulation Areas
5. Press "Washups" Satellite Accumulation Area
6. Waste Coatings Satellite Accumulation Area
7. Waste Glue Satellite Accumulation Area

8. Drum Storage Pad
9. Still Bottoms Satellite Accumulation Area

Facility access is controlled by keeping all doors locked and screening all visitors at the front entrance. There is no formal security system. Except for a 25-square-foot enclosure for raw materials on the west side, the facility is not fenced.

The nearest surface-water body, Silver Creek, is a half mile east of the facility and is used for industrial purposes. The Des Plaines River is approximately two miles east of the facility.

Ground water is not used as a drinking water supply. The nearest source currently used for drinking water is Lake Michigan, located approximately 13 miles east of the facility. However, ground water is maintained as a backup source of drinking water for DuPage County, located 4 miles west of the facility.

Sensitive environments are not located on site. There are no wetlands, sensitive habitats, or national/state parks within two miles of the facility.

Since 1980, AGI has had no documented releases to ground water, surface water, air, or on-site soil.

Solid Waste Management Units 1 through 7 and 9 have low potential for release to ground water, surface water, air, and on-site soils. They are located indoors and have controls to prevent leakage.

Open cans of waste ink (D001) are allowed to accumulate on the floor next to SWMU 3 and an open drum of press "washups" was observed in SWMU 5. BVWST recommends containers of waste be maintained closed, except when necessary to add or remove waste.

The asphalt Drum Storage Pad (SWMU 8) has no dikes or fencing. No release control equipment such as squeegees, shovels, or fire extinguishers are maintained outdoors by the pad. No part of the drum storage pad is located the minimum 50 feet from the property boundary required by 40 CFR, Part 265, Subpart I for ignitable or reactive waste.

BVWST recommends that drums be stored in accordance with 40 CFR Part 265, Subpart I, or an approved variance. AGI consultants, Environmental Risk Consultants Inc., are preparing a request for a variance, to be allowed to store drums in this area.

The asphalt Drum Storage Pad (SWMU 8) has a moderate potential for release to the ground water and on-site soil. The Drum Storage Pad is used to store all of the wastes generated at the facility. Located in the northern half of the western border of the facility, this unit is upgradient on the slope that leads to the railroad tracks west of the facility. During a recent inspection, the IEPA found 26 drums of an unknown substance on the Drum Storage Pad. IEPA required these drums to be overpacked, which AGI did. Many of the drums were uncovered, substances may have leaked while these drums were left outside. Because there is a possibility of contamination to the soil under and around the Drum Storage Pad, BVWST recommends soil sampling on the sloped area of the pad (SWMU 8) and of the soil next to the railroad tracks.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PAs) and visual site inspections (VSIs) of hazardous waste treatment and storage facilities in Region 5. B&V Waste Science and Technology Corp. (BVWST), TES 9 team member, was tasked by PRC to conduct the PA/VSI for the AGI Inc. (AGI) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMUs) and areas of concern (AOCs).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA included review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the AGI facility in Melrose Park, Illinois. The PA was completed on December 9, 1991. BVWST gathered and reviewed information from the facility files and personnel, the Illinois Environmental Protection Agency (IEPA), Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), EPA Region 5

RCRA files, as well as flood plain maps (FEMA, 1984) and Illinois State Geological Survey Circulars 178, 542, 406 and 460. The VSI was conducted on December 10, 1991. It included interviews with three facility representatives and a walk-through inspection of the facility. Nine SWMUs and no AOCs were identified at the facility.

BVWST completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. Attachment B includes a VSI summary and 14 inspection photographs. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The AGI facility is located at 1950 N. Ruby Street in Melrose Park, Cook County, Illinois (latitude 41° 54' 30" N and longitude 87° 52' 30" W), as shown in Figure 1. The facility occupies approximately six acres in an industrial area.

The AGI facility is bordered on the north by the Temperature and Equipment Corp. Behind the building is a railroad spur, approximately 25 to 30 feet west. South of the drum storage pad, the railroad spur curves east and enters the facility warehouse. This railroad spur is no longer used. West of the railroad is Golden Dipt, which fronts on Hawthorne Avenue. On the south is North Avenue, on the southeast is Indian Boundary Road, and on the east is Lindberg Heat Treating across Ruby Street.

The facility consists of five one-story buildings covering 260,000 square feet of work space. A common roof with internal brick walls covers all five buildings. The facility has four underground storage tanks which were successfully abandoned in place in accordance with applicable local, state, and federal regulations (ERC, 1991). The facility has one employee parking area along the northern end of the building.

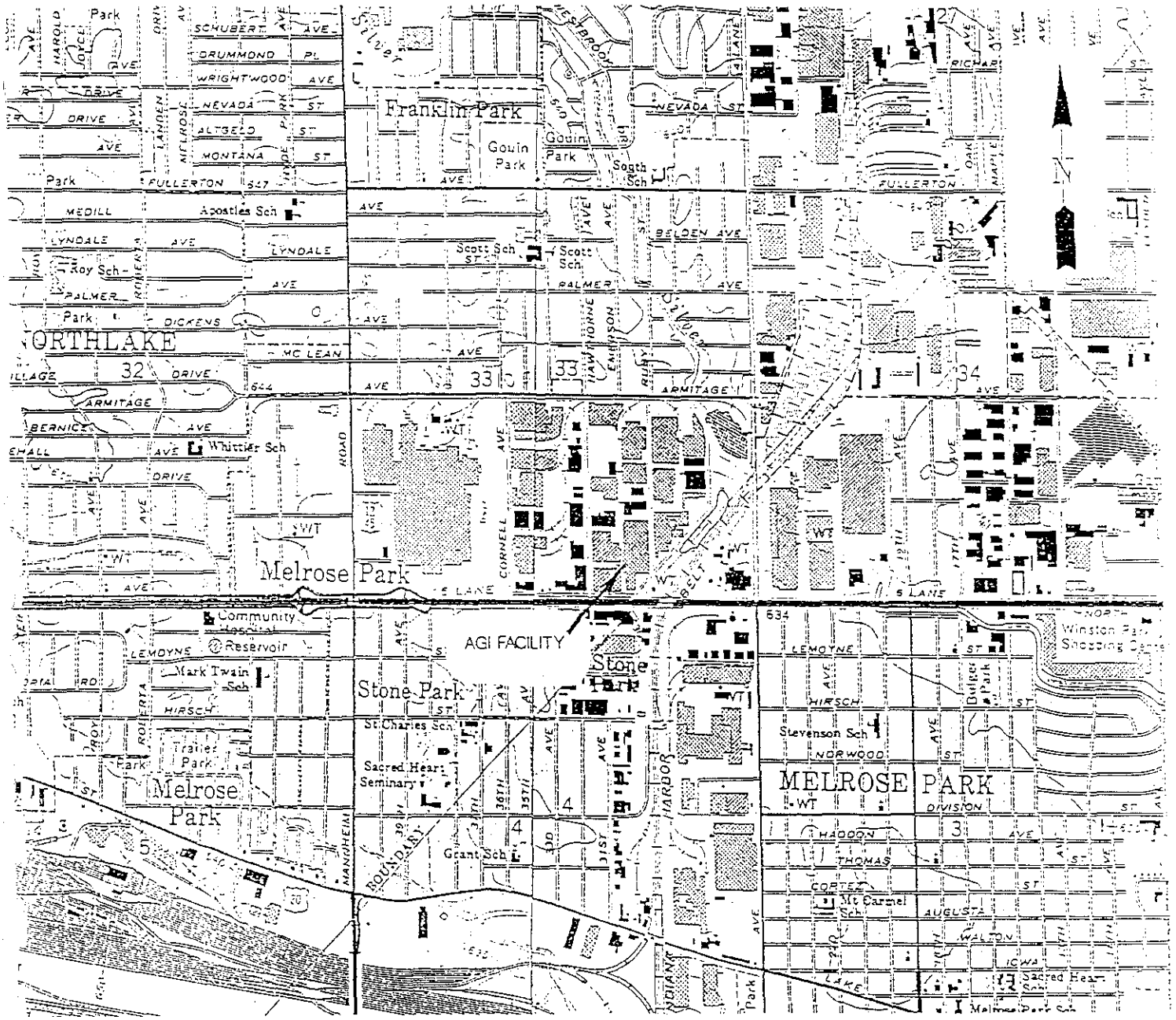
2.2 FACILITY OPERATIONS

The AGI facility manufactures folding cartons, primarily for record, compact disc, and cassette tape covers and cosmetic product packaging. AGI has operated at its current location since 1971, employing about 360 people. During the past decade AGI has experienced rapid growth and changed its regulatory status from a small-quantity generator to a large-quantity generator.

AGI
Melrose Park, Illinois
PA/VSI

FIGURE 1

FACILITY LOCATION



modified from
U.S. GEOLOGICAL SURVEY
1980 and 1978

AGI purchased the facility in 1971 from the Baungarten Calendar Co. Baungarten had operated at the site since 1958, performing the same activities that AGI performs. AGI formally changed its name from Album Graphics Incorporated in 1983. AGI was purchased by Ruby North Partnership in a leveraged buyout in 1987 (Emerson, 1992).

To construct folding cartons, AGI uses six printing presses, five diecutters, and six gluing machines. The major production divisions of the facility include office areas; plate rooms; press rooms; and diecutting, gluing, and storage areas. The primary wastes are non-hazardous paper wastes, and regulated hazardous wastes including inks, glues, and other industrial by-products. All paper is baled and sold for recycling. All hazardous wastes are stored in 55-gallon drums on an asphalt pad outside, on the western edge of the building, then sold to Safety-Kleen Corporation for use as secondary fuels. The nature and utilization of each solid waste management unit is identified in Table 1. Their locations within the facility are shown in Figure 2.

The carton manufacturing process begins with the creation of printing plates that correspond to each of the colors used in a carton. The images are created in the drafting room using Mylar and Rubylith paper,and then photographically transferred to the printing plates. The used Mylar and Rubylith paper is discarded to 55-gallon drums. This non-hazardous waste is accumulated at a rate of about four barrels per year (two of each) and is stored in the plate room in the northeast corner of the building. Full barrels are picked up by DuPont of Niles, Illinois for recycling.

The printing plates are mounted into the printing presses. The printing process uses photo-sensitive printing plates which are reused when the production of a carton is complete. No hazardous materials are generated in this process.

Paper is received in rolls and must be cut into sheets of appropriate sizes. Five of the six printing presses are fed sheets of paper; the sixth printing press is roll-fed. As paper moves under the rollers of the printing press, color is applied by using the printing plate corresponding to each color. When all colors have been applied, most sheets receive a high-gloss coating which is also applied by the press and dried by ultraviolet light. The printed, coated, and dried sheets or rolls are collected at the end of the press.

TABLE 1

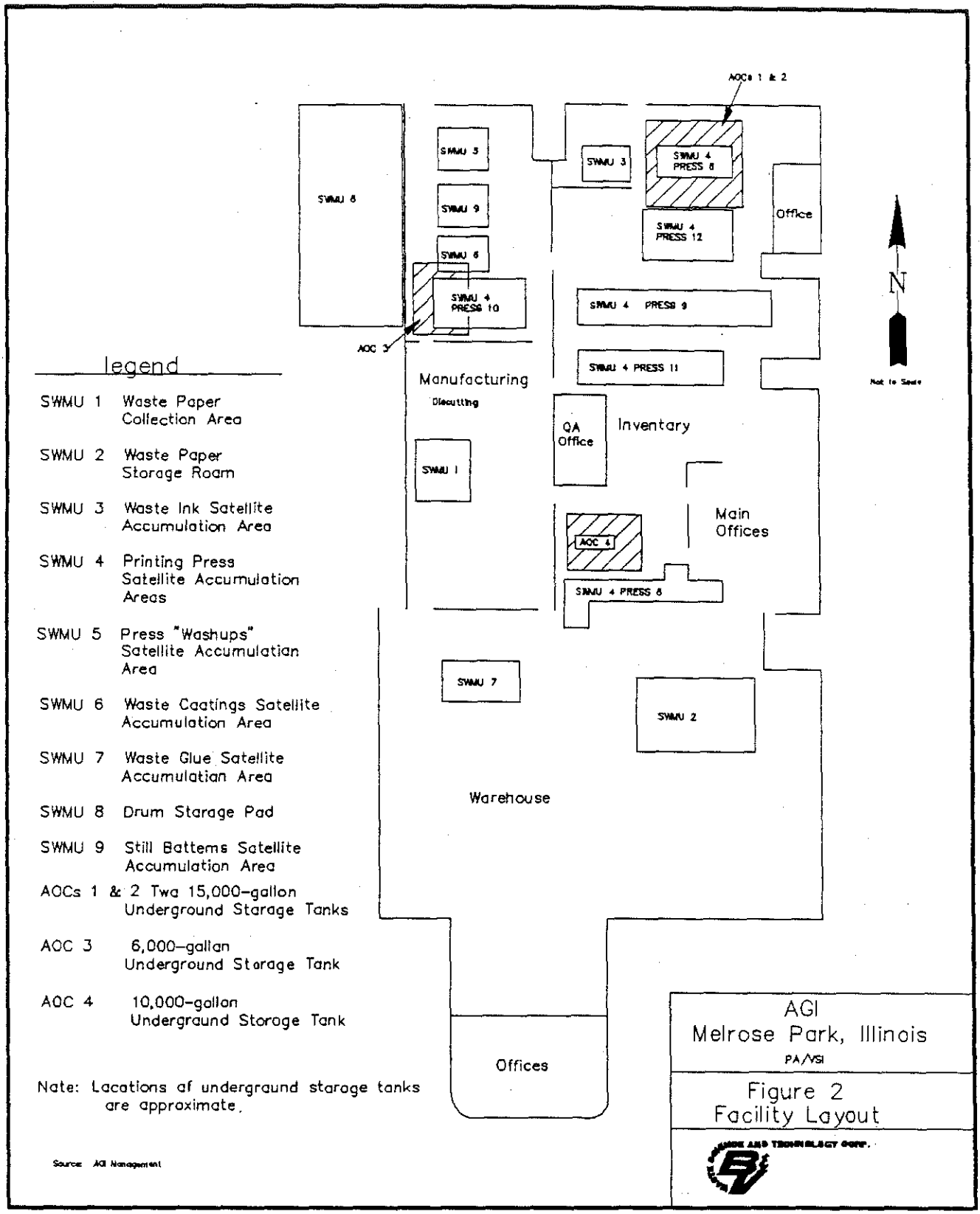
SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Waste Paper Collection Area	No	Active
2	Paper Waste Storage Room	No	Active
3	Waste Ink Satellite Accumulation Area	No	Active
4	Printing Press Satellite Accumulation Areas	No	Active
5	Press 'Washups' Satellite Accumulation Area	No	Active
6	Waste Coatings Satellite Accumulation Area	No	Active
7	Waste Glue Satellite Accumulation Area	No	Active
8	Drum Storage Pad	Yes	Active**
9	Still Bottoms Satellite Accumulation Area	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

** Personnel at the AGI facility have stated wastes are stored for less than 90 days, however, generation rates and quantities on site, recorded during an IEPA inspection (IEPA, 1991) indicate storage time exceeds 90 days.


AOCs 1 & 2
SWMU 5
SWMU 3
SWMU 4 PRESS 8
SWMU 8
SWMU 9
Office
SWMU 4 PRESS 12
SWMU 6
SWMU 4 PRESS 10
SWMU 4 PRESS 9
AOC 3
SWMU 4 PRESS 11
Manufacturing
Diecutting
QA Office
Inventary
SWMU 1
Main Offices
AOC 4
SWMU 4 PRESS 8
SWMU 7
SWMU 2
Warehouse
Offices
N
Not to Scale
legend
SWMU 1 Waste Paper Collection Area
SWMU 2 Waste Paper Storage Room
SWMU 3 Waste Ink Satellite Accumulation Area
SWMU 4 Printing Press Satellite Accumulation Areas
SWMU 5 Press "Washups" Satellite Accumulation Area
SWMU 6 Waste Coatings Satellite Accumulation Area
SWMU 7 Waste Glue Satellite Accumulation Area
SWMU 8 Drum Storage Pad
SWMU 9 Still Bottems Satellite Accumulation Area
AOCs 1 & 2 Two 15,000-gallon Underground Storage Tanks
AOC 3 6,000-gallon Underground Storage Tank
AOC 4 10,000-gallon Underground Storage Tank
Note: Locations of underground storage tanks are approximate.
Source: AGI Management
AGI
Melrose Park, Illinois
PA/VSI
Figure 2
Facility Layout

Ink is applied to the printing plates using several steps. Printing ink is delivered onto rollers at the top of the press. As each roller turns, ink is transferred to the next roller by gravity-feed . The bottom roller, which contains an evenly distributed layer of ink, transfers the printing ink to the printing plate. The plate has been treated so that ink adheres only to that part of the plate corresponding to the image to be transferred to paper. As the printing plate rotates, it is continuously treated with a solution of ethanol and water (fountain solution) to remove adherent ink from areas not corresponding with the image. The ink from the printing plate is transferred to another roller beneath the printing plate. This roller receives a mirror image of the desired graphic. The image is transferred onto the paper as the roll or sheet of paper passes beneath this roller.

Each printing press contains six printing plates. These plates contain images corresponding with six different colors on the final graphic. When all colors have been transferred onto paper, the sheet or roll receives a layer of high gloss or ultraviolet (UV) coating. The coating is applied to a rotating "blanket" which transfers a thin layer to the paper. The paper then passes beneath an ultraviolet lamp which affixes and dries all paints and the coating. The printed paper is either stacked or rerolled at the end of the press.

The printed paper is moved to the diecutting room where sheets of paper containing multiple images are diecut to create individual packaging units. The diecutters also create creases on the cartons to ensure that when they are folded, the edges are formed at the right places. This process creates a large quantity of paper scrap. Not all of the printed sheet is used for the cartons. The excess paper is punched out and collected on the floor around the diecutters.

The diecut carton units are aligned single file on the gluing machines. The machines apply glue to the appropriate tabs and fold the paper so that a completely folded and glued carton is produced. The cartons are moved into the storage rooms until they are shipped to clients.

2.3 WASTE GENERATING PROCESSES

The primary waste streams generated at the AGI facility are: paper (non-hazardous), ink (D001), water/alcohol mixture (D001), lubricating oil (D001), press "washups" (D001), still bottoms (D001), water-based coatings (D001), ultra-violet coatings (D001), and adhesives (D001). These wastes are generated during the production of record, compact disc, and cassette tape covers or cosmetic product packing.

AGI has not changed the basic materials in its waste streams since the plant's purchase in 1971. Though some of the printing presses have been moved, their waste water/alcohol mixture, and ink waste receptacles, and quality assurance pullout pallets moved with them. AGI has instituted the use of a distillation process which allows the recycling of some water/alcohol printing press cleaning solution with subsequent volume reduction of that waste stream.

All wastes generated at AGI, except for waste paper, are eventually transported to the Drum Storage Pad (SWMU 8) for storage, pending collection by Safety-Kleen Corp. Since 1989, full 55-gallon drums of waste ink, water/alcohol solution, still bottoms, press "washups", coatings, and glue are collected at least every 90 days by Safety-Kleen Corp., Elgin, Illinois for use as secondary fuels. From 1986 to 1989, Pollution Control Industries, Inc. collected the waste. Facility representatives indicated that they do not know who removed the wastes off site prior to 1986 or how the waste was managed prior to 1980. SWMU 8 is located outside of the building on an asphalt surface against the west wall of the facility. Wastes generated at the facility are discussed below and summarized in Table 2. Generation rates presented are based on 1990 waste generation data.

2.3.1 Printing

The printing inks used at the facility are bought in sealed containers and stored at the facility until they are needed. About 95% of the inks are UV-reactive inks and contain no solvent. The remaining 5% are conventional oil-based inks containing solvents. Both types of waste ink are handled the same. Waste ink is generated as excess during production, or when ink becomes contaminated. Waste inks (D001) are taken to the Waste Ink satellite accumulation area (SAA) (SWMU 3), located at the northern edge of the printing room. A 55-gallon drum is kept at this location to receive the small quantities of ink wastes generated elsewhere. When a drum is filled it is moved out of this SAA to the Drum Storage Pad (SWMU 8) at the back of the facility. In 1990, 900 gallons of waste ink were generated in this manner.

2.3.2 Printing Plate Cleaning and Distillation

As described in Section 2.2, Facility Operations, a water/alcohol solution (fountain solution) is used to continuously clean the printing plates during operation. The solution is mixed at the facility from bulk alcohols and city water.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Paper Waste (Non-Hazardous)	Die Cutters	SWMUs 1, 2
Quality Assurance Pullouts (Non-Hazardous)	Printing Presses	SWMUs 1, 2, 4
Waste Ink/D001	Printing Presses	SWMUs 3, 8
Waste Water/Alcohol Mixture/D001	Printing Presses	SWMUs 4, 8
Waste Lubricating Oil/D001	Printing Presses	SWMUs 4, 8
Antifreeze Waste	Printing Presses	SWMU 8
Press Washups/D001	Printing Press Cleaning	SWMUs 4, 5, 8
Still Bottoms/D001	Solvent Recovery Still	SWMUs 8, 9
Waste Coatings/D001	Printing Presses	SWMUs 6, 8
Waste Glue/D001	Gluing Machines	SWMUs 7, 8
Unknown Waste	Unknown	SWMU 8

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

Waste water/alcohol solution (D001) is generated in two separate ways. The first occurs during daily operation as the printing plates are continuously rinsed to remove ink adhering to areas not corresponding with the image, or when a color or pattern is changed in the printing press. Waste water/alcohol solution generated throughout the day is collected in a 55-gallon drum in the Printing Press SAA (SWMU 4). SWMU 4 is actually a collective term for the drum stations located by each of the six printing presses. When a 55-gallon drum is filled it is moved to the Drum Storage Pad (SWMU 8).

Waste water/alcohol solution is also generated every week when the waste water/alcohol mixture is drained from the presses regardless of color changes. The waste water/alcohol solution drained from the press into a 55-gallon drum is moved directly to a solvent recovery still where it is temporarily stored. When several drums are full, the solvent recovery still is used to distill useable water/alcohol mixture from the waste water/alcohol mixture. The AGI facility initiated the internal distillation system in 1991 to reclaim waste water/alcohol solution which was previously discarded as a hazardous waste. Still bottoms are collected in a 55-gallon drum at the Still Bottom SAA (SWMU 9) located by the still. Full drums of still bottoms are transferred to the Drum Storage Pad (SWMU 8) for temporary storage prior to disposal.

In 1990, approximately 9,500 gallons of waste water/alcohol mixture were generated. The annual reduction in waste achieved by distillation cannot be determined because of the short time the solvent recovery still has been in use.

2.3.3 Press Lubrication

Each press also has a five-gallon vessel for the storage of lubricating oil (D001) which continuously runs across the moving parts of the machinery during operating hours. As the lube oil runs out of the press it is collected in a small basin at the base of the press. When this basin is full, it is drained into a 55-gallon drum in the Printing Press SAA (SWMU 4). This drum is also moved to the Drum Storage Area (SWMU 8) when full. In 1990, approximately 500 gallons of lube oil were generated.

2.3.4 Quality Assurance Pullouts

Printed sheets are removed from the production line to ascertain the quality of print produced. These quality assurance sheets are stacked on a pallet next to each press. These QA

sheets are transported to the baling room where they are shredded and baled. The scrap bales are transported to the Paper Waste Storage Room (SWMU 2) located west of the baling room and are stored in groups according to the quality of paper contained in them. All paper is sold to Atlas Recycling in Chicago, Illinois. In 1990, approximately 8.5 million pounds of all types of paper wastes including pullouts were sold for recycling.

2.3.5 Press "Washups"

At the end of each week, and when any press is being changed over to a new product, each printing press goes through a complete cleanup. A mixture called press "washups" is used to remove all production residue from the machinery. The dissolution agents in the mixture are propylene glycol methyl ether (CAS 107-98-2) and dipropylene glycol methyl ether (CAS 34590-94-8). After use, the press "washups" (D001) from all presses except No. 12 are collected in a 55-gallon drum which is stored in the Press "Washups" SAA (SWMU 5), located near the northwest corner of the plant and also referred to as the Chemical Storage Room. Similarly, a drum for press "washups" is maintained in the SAA by press No. 12. Full 55-gallon drums of press "washups" are transferred to the Drum Storage Pad (SWMU 8) for temporary storage prior to disposal. Approximately 500 gallons of press "washups" were generated in this manner in 1990.

2.3.6 Paper Coatings

Waste Coatings (D001) are generated when coatings being applied to printed sheets become contaminated or when excess coating must be disposed of. A 55-gallon drum for waste coatings is kept at the Waste Coatings SAA (SWMU 6). SWMU 6 is in the corner of the raw materials storage room at the northwest corner of the plant. When a 55-gallon drum becomes full it is transferred to the Drum Storage Pad (SWMU 8). Approximately 600 gallons of waste coatings were generated of in this manner in 1990.

The UV coatings are dried under ultraviolet lamps. The ultraviolet lamps are cooled with antifreeze. When the antifreeze level gets low, more is added. Antifreeze waste is not generated on a regular basis but when it is removed, it is drummed and transported to SWMU 8 for pickup by Safety-Kleen Corp.

2.3.7 Diecutting

Paper waste is generated at the diecutting press as full sheets with poor quality print and as small scraps of excess paper. All paper waste is considered non-hazardous. It is transported to the Waste Paper Collection Area (SWMU 1) along the western wall of the diecutting room. Paper waste is kept here for a short amount of time, usually only a shift or two, before it is transferred to the baling room.

Large pieces of paper waste are transported in wheeled carts to the baling room located near the storage rooms at the southeast side of the facility. The small scraps are tossed into a cyclone, a vacuum system that conveys the paper along pipes to the baling room. This room contains a "hogger" which collects the paper waste and shreds it to pieces. The shredded paper is transferred directly to the baler, which automatically turns on, bales, and dispenses the baled paper.

The bales of scrap are transported to the Paper Waste Storage Room (SWMU 2) located west of the baling room and are stored in groups according to the quality of paper contained in them. All paper is sold to Atlas Recycling in Chicago, Illinois. In 1990, approximately 8.5 million pounds of all types of paper wastes including wastes from diecutting were sold for recycling.

2.3.8 Gluing

Waste Glue (D001) is produced when glue becomes contaminated or when it dries in the container and forms a skin on its surface. A 55-gallon drum for waste glue is kept at the Waste Glue SAA (SWMU 7). SWMU 7 is located in the finishing room, south of the gluing machines. When the 55-gallon drum becomes full, it is transferred to the Drum Storage Pad (SWMU 8) for temporary storage prior to disposal. Approximately 700 gallons of waste glue were generated in this manner in 1990.

2.4 HISTORY OF DOCUMENTED RELEASES

A complaint form was filed with the Illinois EPA, Department of Water Pollution Control by an anonymous worker on June 20, 1990. The complainant reported the AGI facility disposes organics and other volatile chemicals (85% volatile) down the sewer (DWPC, 1990). The anonymous worker was instructed to call the hotline 1-800-322-DUMP with any detailed

information he/she might have later on. The complaint was referred to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) (DWPC, 1990). BVWST contacted Mr. Frank Kelly of the Industrial Waste Department of MWRDGC on March 20, 1992. He could not find reference to this complaint referral in the MWRDGC files.

2.5 REGULATORY HISTORY

2.5.1 RCRA Status

The facility currently operates with interim status as a large-quantity generator storing wastes for less than 90 days. Mr. Stanley E. Wheeler, who was then the facility vice president and plant manager, submitted a notification of hazardous waste activity to EPA on August 8, 1980 (AGI, 1980a) and a RCRA Part A permit application on November 13, 1980 (AGI, 1980b). This application listed 3,300 gallons per year of unspecified waste stored in containers. Illinois EPA licenses 79 26 46 and 79 26 47 were referenced. A reacknowledgement of notification of hazardous waste activity, issued by USEPA, dated September 28, 1981 is included in the AGI file available to BVWST.

In the RCRA Part A permit application, AGI stated they would be a TSD facility. However, they have not kept any waste in storage for more than 90 days since their initial acceptance into the RCRA program in 1980, according statements made by to Mr. Stan Wheeler during the VSI conducted on December 10, 1991. Consequently, AGI has hired Environmental Risk Consultants Inc. of Evanston, Illinois in early 1992, to compile a closure plan for the facility Drum Storage Pad (SWMU 8). A RCRA Part B permit application was not filed by November 8, 1988, consequently the AGI interim status expired November 8, 1992 (Emerson, 1992).

2.5.2 Illinois EPA Status

A representative of the Illinois EPA Department of Land/Noise Pollution Control (DLNPC), conducted an inspection of the AGI facility March 10, 1982, and concluded that AGI did not generate hazardous waste. DLNPC recommended by letter that AGI submit a letter requesting deletion from the hazardous waste facility list (IEPA, 1982). There is no further mention of the issue in the files available to BVWST.

During the IEPA site inspection conducted on October 29, 1991, five apparent violations were observed. The most severe violation was 26 drums of unknown waste behind the plant on the Drum Storage Pad (SWMU 8). In addition, violations included using drums in bad condition, not closing drums, and not providing waste training or refresher courses (IEPA, 1991). The drums of unknown material have been overpacked. According to Mr. Stan Wheeler, drums in good condition are used for storage of waste material, and all drums and areas with drums have been marked.

In waste disposition form, included with the October 29, 1991 inspection report, the following generation rates and on-site amounts are listed (among others):

- Ink waste, one drum generated per month, six drums stored;
- Glue waste, one half drum generated per month, seven drums stored;
- Press "washups" waste, one drum generated per month, eleven drums stored;
- Water-based coating waste, one and a half drums generated per month, eight drums on site; and
- Ultraviolet coating waste, one drum generated per six months, twenty-three drums stored.

2.5.3 Air Permits

The facility has the following air permits for the following units: the Hogger from SWMU 2 - 86050030; SWMU 5 - 86050031. AGI has no history of air permit compliance problems. The facility has no history of odor complaints from area residents.

The AGI facility initiated an internal distillation system in 1991, to reclaim waste water/alcohol solution. During the initial testing phase no permits were required for operation of the still. The distillation is now moving into regular operation and an air permit application has been prepared for AGI by Carlson Consultants Inc. from Springfield, Illinois and submitted to the IEPA (Emerson, 1992). This still should not affect the facility RCRA status.

2.5.4 NPDES Status

The facility has no, and is not required to have, a National Pollutant Discharge Elimination System (NPDES) permit.

2.5.5 MWRDGC Status

The AGI facility is required to report raw product storage, and waste generation and disposal to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), a publicly owned treatment works. Raw products are reported on a yearly basis, waste generation and disposal are reported on a monthly basis. This reporting allows the MWRDGC to plan appropriate response to a possible catastrophic event.

On March 21, 1989, a MWRDGC representative conducted an inspection of the AGI facility. As a consequence of this inspection AGI was notified of a reporting violation concerning the generation and disposal of sludge. A conciliation meeting was held May 3, 1989. Reports for the first three months of 1989 were received May 5, 1989. The April 1989 report was received on time. MWRDGC has no further record of reporting from AGI (Kelly, 1992). The initial contact questionnaire from 1989 is not on record, so a questionnaire will be sent. Additionally, AGI was a part of a mass mailing of monthly manifest forms dispatched in March, 1992 (Stuba, 1992). Twelve blank forms were mailed to each facility. One was to be filled out each month and returned to the MWRDGC.

2.5.6 Underground Storage Tank Status

Four underground storage tanks (USTs) are located beneath the concrete slab foundation of the building. The tanks were formerly used for heating oil storage. AGI hired Environmental Risk Consultants Inc. (ERC) to assist in the 1991 in-place abandonment of the USTs. AGI applied to the Office of the State Fire Marshal (OSFM) and received Permit No. 321-91ABN for the abandonment of the tanks. Information presented here is from the ERC draft report.

The northern of two 15,000-gallon USTs located in the northeast corner of the facility, was emptied, cleaned, and internally inspected on October 10 and 11, 1991, by OHM Remediation Service Corporation of Findlay, Ohio (OHM), an ERC subcontractor. OHM observed no indications of corrosion failure. Four soil samples were collected from four 11-foot borings in the

vicinity of the two tanks. The soil was visually inspected and the samples were chemically analyzed for benzene, ethylbenzene, toluene, and xylenes (BETX). None of these possible contaminants were found above detection limits. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991.

The southern of two 15,000-gallon USTs located in the northeast corner of the facility, was emptied, cleaned, and internally inspected on October 10, and 11, 1991, by OHM. On October 11, 1991, the OSFM tank specialist deemed the tank to be a leaking UST. Information on the closure of the tank is available from the Illinois Emergency Services and Disaster Agency, Incident No. 91-2908 (ESDA, 1991). Four soil samples were collected from four 11-foot borings in the vicinity of the two tanks. The soil was visually inspected and the samples were chemically analyzed for BETX. None of these possible contaminants were found above detection limits. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991. In March 1992, Illinois EPA (IEPA) sent the facility a letter indicating that the tank was successfully abandoned (IEPA, 1992).

A 6,000-gallon UST, located on the northwest side of the facility, under press 10, was emptied, cleaned, and internally inspected on October 10 and 11, 1991, by OHM. OHM observed no indications of corrosion failure. Three soil samples were collected from three 11-foot borings in the vicinity of the tank. The soil was visually inspected and chemically analyzed for BETX. One sample had a concentration of 2.7 parts per billion toluene. This is below the IEPA's Leaking UST Soil Cleanup Objectives. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991.

A 10,000-gallon UST, centrally located at the facility, was emptied, cleaned, and internally inspected on October 10 and 11, 1991, by OHM. OHM observed no indications of corrosion failure. Two soil samples were collected from two 11-foot borings in the vicinity of the tank. The soil was visually inspected and the samples were chemically analyzed for BETX. None of these possible contaminants were found above detection limits. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the AGI facility.

2.6.1 Climate

AGI is located 10 miles west of downtown Chicago, Illinois. Climatic data for the city of Chicago was collected for the last thirty-two years through 1990 by the National Weather Bureau at O'Hare Airport. Average daily maximum temperature is 58.7°F and average daily minimum temperature is 39.7°F. Annual net precipitation averages 33.34 inches, and the greatest twenty-four hour rainfall has been 9.35 inches, recorded in August 1987. The average wind speed is 10.3 mph. The prevailing wind is from the west in winter, from the west and south-southwest in the spring, from the southwest in summer, and from the south-southwest in the fall.

2.6.2 Flood Plain and Surface Water

Surface-water drainage at the facility is generally to the northeast toward Silver Creek. The nearest surface-water body, Silver Creek, is located one-half mile east of the facility and is used for industrial purposes. This surface-water body discharges to Des Plaines River about two miles from the facility.

According to the Federal Emergency Management Agency Flood Insurance Rate Map of Melrose Park (FEMA, 1984), the facility lies within the 100-year flood plain of the Des Plaines system.

2.6.3 Geology and Soils

Much of Cook County has not been mapped in detail by the U.S. Department of Agriculture (1979) because of urban land use. However, the report supplies a regional soil map that classifies the near-surface soil near AGI as nearly level, poorly drained soil resulting from the deposition of clay and silt in a glacial lake.

Geology at the site is an unknown thickness of glacial deposits (lacustrine clay, till, and outwash) over Paleozoic sedimentary rock units. No site-specific information on the stratigraphy is presently available. However, a detailed statewide study by Berg and Kempton (1988) provides three-dimensional regional mapping of geologic materials to a depth of 50 feet. Their map suggests that at least 50 feet of clayey and silty tills and lacustrine deposits is normal for the area.

2.6.4 Ground Water

Very little site-specific hydrogeologic information is currently available. Therefore, no statements may be made regarding the ground-water flow rates or flow directions, the stratigraphic position of aquifers beneath the site, or the possible interaction of ground water and surface water at the adjacent river. Borings made during the abandonment of the underground storage tanks indicate the depth to the water table is approximately eleven feet. Regional ground-water data is presented below.

In the northeastern Illinois region, ground water is obtained from four major aquifer systems--the glacial drift system, the shallow bedrock system, and two deep bedrock systems. They are distinguished by their hydrogeologic properties and recharge source areas (Hughes et al, 1966). In central Cook County, the glacial drift is thin, and sand and gravel deposits are either thin or absent. Virtually all wells penetrate deep bedrock aquifers (Bergstrom et al., 1955).

The shallow bedrock aquifer system in northeastern Illinois underlies the glacial drift system and is composed mainly of Silurian dolomite formations. The upper boundary of this system is the bedrock-drift contact; the lower boundary is the upper Ordovician Maquoketa Shale. Water from this aquifer is obtained from fractures and solution openings in the Silurian dolomite beds (Hughes, et al., 1966). The shallow bedrock aquifer system receives some recharge locally from precipitation (Hughes et al., 1966).

The deep bedrock-aquifer systems include the Cambrian-Ordovician and Mt. Simon aquifer systems. The Cambrian-Ordovician aquifer system contains two major aquifers--the Glenwood-St. Peter and the Ironton-Galesville. The top of the Cambrian-Ordovician aquifer system is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely utilized where water requirements are less than 200-gallons per minute (gpm). This unit has a hydraulic conductivity between nine and 15-gallons per day per square foot (gpd/sq. ft.). The Ironton-Galesville Sandstone aquifer has a hydraulic conductivity between 30 and 40 gpd/sq. ft. Recharge to the deep bedrock aquifer systems is mostly from west and north of the six-county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge occurs as leakage through the shallow bedrock aquifer system (Hughes et al., 1966).

The Mt. Simon aquifer system is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by pre-Cambrian basement

rock. The average hydraulic conductivity of the aquifer system is 16 gpd/sq. ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in central southern Wisconsin (Willman, 1971).

The facility is located in Melrose Park, Cook County, Illinois, which receives its drinking water from Lake Michigan. The nearest communities that use ground water for daily drinking water are located about 20 miles west of the facility in western DuPage County, along and west of State Route 59. Until 1992, all of DuPage County drinking water was obtained from ground-water sources, but since 1992, it is obtained from Lake Michigan. However, ground-water wells throughout the county are maintained as an emergency backup supply. The eastern boundary of DuPage County is located about 4 miles west of the facility (PRC, 1993).

2.7 RECEPTORS

The AGI facility occupies approximately six acres in an industrial area in Melrose Park, Illinois. Melrose Park has a population of approximately 25,000.

The AGI facility is bordered on the north by the Temperature and Equipment Corp. Behind the building is a railroad spur, approximately 25 to 30 feet west. Beyond the railroad is Golden Dipt, which fronts on Hawthorne Avenue. On the south is North Avenue, on the southeast is Indian Boundary Road, and on the east is Lindberg Heat Treating across Ruby Street. The nearest school, Stevenson School, is located approximately 3,400 feet southeast of the facility.

There is no formal security system. Facility access is controlled by keeping all doors locked and screening all visitors at the front entrance. Except for a 25-square-foot enclosure for raw materials on the west side, the facility is not fenced.

The Drum Storage Pad is not fenced and is located between the building and the railroad. The railroad is about 30 feet from the building; this does not allow space to keep ignitable materials a minimum of 50 feet from the facility property line.

The nearest surface water body, Silver Creek, is located a half mile east of the facility and is used for industrial purposes. Other surface-water bodies in the area include the Des Plaines River, about two miles east of the facility.

Ground water is not used as a drinking water supply in Melrose Park. Melrose Park obtains its drinking water supply from Lake Michigan, located 13 miles east of the facility. The nearest communities that use ground water for a daily drinking water source are located about 20 miles west of the facility in western DuPage County, along and west of State Route 59. However, ground-water wells throughout DuPage County are maintained as an emergency backup supply. The eastern boundary of DuPage County is located about 4 miles west of the facility.

Sensitive environments are not located on site. There are no wetlands, sensitive habitats, or national/state parks within two miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and BVWST observations. Figure 2 shows the SWMUs locations.

SWMU 1	**Waste Paper Collection Area**
Unit Description:	The Waste Paper Collection Area is at the western end of the facility. This unit is used to collect waste paper cut from printed sheets. The waste paper is swept into a cyclone that deposits it into a bin. This unit is made of metal and measures approximately 100 square feet. The walls and floor of this unit are concrete. No specific boundary area exists to contain the waste paper (see Photograph No.11).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages paper waste. Wastes from this unit are ultimately recycled by Atlas Recycling in Chicago, Illinois.
Release Controls:	This unit is located indoors on a concrete floor. A sprinkler system and large fire extinguisher are located in this area.
History of Documented Releases:	No releases have been documented from this unit.
Observations:	This unit was full of waste paper during the VSI. This unit had no apparent boundary; however, it appeared to adequately contain

	waste paper. This unit is not used to manage hazardous materials. No evidence of a release was observed.
SWMU 2	**Paper Waste Storage Room**
Unit Description:	The Paper Waste Storage Room is located above ground at the southeastern end of the facility. This unit is used to store the bales of waste paper generated by the baling machine. These bales are separated by grade of paper and prepared for removal. This unit measures 500 square feet and consists of concrete floor and walls (see Photograph No. 13).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages paper waste. Wastes from this unit are ultimately recycled by Atlas Recycling in Chicago, Illinois.
Release Controls:	This unit is located indoors on a concrete floor and has a sprinkler system for possible fires.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained about 25 bales of various grades of waste paper during the VSI. This unit is not used to manage hazardous materials. No evidence of a release was observed.
SWMU 3	**Waste Ink Satellite Accumulation Area**
Unit Description:	The Waste Ink SAA is located in the southern end of the manufacturing area. This unit is used to store the 55-gallon waste

	ink drum, which receives all excess ink from all the printing presses, before it is moved to the Drum Storage Pad (SWMU 8). The drum is constructed of steel and is located in an area constructed with concrete floor and walls. (see Photograph No. 14).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages waste ink (D001). Currently, wastes from this unit are ultimately picked up by Safety-Kleen Corp. However, facility representatives indicated that they do not know how the waste was managed prior to 1980.
Release Controls:	The unit is indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit contained about 25 gallons of waste ink. In Photograph No. 14, the drum lid is in place but is not secured. Full, open cans of waste ink are setting on the floor by the drum. No evidence of a release was observed.
SWMU 4	**Printing Press Satellite Accumulation Area**
Unit Description:	The Printing Press SAA is in the northern end of the facility. This unit is an SAA for waste products that are regularly generated by the printing presses. SWMU 4 is a collective name for substations located by each of the six printing presses. At each substation are a drum for water/alcohol "fountain" solution, a drum for waste lubricating oil and a pallet for quality assurance pullout sheets. Additionally, a drum for waste press "washup" solution is kept by

	Press No. 12. The drums rest on a concrete floor (Photographs Nos. 1, 2, 3, and 4).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste water/alcohol mixture (D001), waste lubrication oil (D001) in drums and quality assurance pullout sheets.. Additionally, a drum for waste press "washup" solution is kept by Press No. 12. Approximately 25-45% is taken to the solvent recovery still, where it is distilled and recovered for use on the printing press. Currently, the remaining 55-75% of wastes from this unit are transferred to the drum storage pad (SWMU 8), where they are picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the wastes were managed prior to 1980.
Release Controls:	The unit is located indoors on a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained waste water/alcohol and waste lubricating oil during the VSI. This unit consisted of a 55-gallon drum of waste water/alcohol, a 55-gallon drum of lubricating oil, and a pallet of sheets of paper removed from the press for quality control by each press. Additionally, a drum for waste press "washup" solution is kept by Press No. 12. The drums are kept closed except when receiving waste. There were no visible signs of release.

SWMU 5	**Press "Washups" Satellite Accumulation Area**
Unit Description:	The Press "Washups" SAA is at the northwestern corner of the building, on a concrete floor. This unit stores "press washups" in 55-gallon drums from the weekly press cleaning. This unit measures 50 square feet and is made with a concrete floor and cement block walls. The drums are made of a metal alloy (see Photograph No. 7).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages press "washups" (D001) in 55-gallon drums. Currently, full drums of wastes from this unit are ultimately moved to the drum storage pad (SWMU 8) where they are picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the wastes were managed prior to 1980.
Release Controls:	This unit is located on a concrete floor with no floor drains in the area. The area is diked to prevent spill releases.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	A drum, shown in Photo No. 7, is open, with a funnel in the opening. This unit contained one 55-gallon drum approximately one-half full of press "washup", and several full drums during the VSI. When a drum becomes full, it must be moved from satellite accumulation to the drum storage pad (SWMU 8) within three days. The large number of drums in SWMU 5 (five are visible in Photograph No. 7)

makes it questionable that full drums are being removed from the unit properly. No evidence of a release was observed.

SWMU 6	**Waste Coatings Satellite Accumulation Area**
Unit Description:	The Waste Coatings SAA is in the southern corner of the raw materials storage room in the northwestern corner of the plant. This unit is used as the primary collection area for contaminated or excess waste coatings. This unit measures 25 square feet and consists of a concrete floor and cement block and brick walls. The lower portion of the walls are shielded with steel sheeting. The drums are of metal alloy (Photographs Nos. 5 and 6).
Date of Startup:	This unit began operation on November 14, 1991. Prior to this time, there was no central collection of waste coatings.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste water-based and ultra-violet coatings (D001) in 55-gallon drums. Currently, wastes from this unit are moved to the drum storage pad (SWMU 8), where they are picked up by Safety Kleen. Facility representatives indicated that they do not know how the waste was managed prior to 1981.
Release Controls:	The drums are indoors on a concrete floor. No floor drains existed in the area.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained one drum of waste water base coating and one drum of waste ultraviolet coating. The area was clean and well marked. No cracks were visible in the floor. No evidence of release was noted.

SWMU 7	**Waste Glue Satellite Accumulation Area**
Unit Description:	The Waste Glue SAA is located in the southwestern corner of the facility. It is indoors on a concrete floor. This unit is used to collect waste glue (D001). The drum being used for waste glue collection in Photograph No. 12 is constructed of paperboard with metal closures on each end; however, waste glue is usually collected in steel drums (AGI, 1992).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages waste glue (D001) in a 55-gallon drum. Currently, wastes in drums are transferred to the drum storage pad (SWMU 8) where they are ultimately picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the waste was managed prior to 1980.
Release Controls:	The unit rests on a pallet on the concrete floor, indoors.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This drum was about 50% full of the flammable adhesive during the VSI. The floor had no visible signs of cracks. No evidence of a release was observed.
SWMU 8	**Drum Storage Pad**
Unit Description:	The Drum Storage Pad is located outdoors on the northwestern corner of the property. This unit stores all of the wastes to be picked up by Safety-Kleen Corp. Personnel at AGI state wastes are

	stored for less than 90 days, however, generation rates and quantities on site, recorded during an IEPA inspection (IEPA, 1991) indicate storage time exceeds 90 days. This unit is on asphalt pavement approximately 125 feet by 12 feet, capable of storing about 300 drums. (see Photographs Nos. 8, 9, and 10).
Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages all wastes generated at the facility except paper. Currently, wastes from this unit are ultimately picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the waste was managed prior to 1980.
Release Controls:	This unit is located on an asphalt pad. AGI had plans to dike, roof and fence this area, but no part of the drum storage pad is more than 50 feet from the property boundary. AGI consultants, Environmental Risk Consultants Inc., of Evanston, Illinois, are preparing a request for a variance to be allowed to store drums in this area before proceeding with other modifications.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained approximately 100 full, 55-gallon drums for pick-up. All of the drums were sealed and labeled. No evidence of a release was observed.

SWMU 9	**Still Bottoms Satellite Accumulation Area**
Unit Description:	This unit is located adjacent to the solvent recovery still in the northwest corner of the facility. It consists of a steel drum for collection of still bottoms left from the recycling process.
Date of Startup:	This unit has been in use since the initiation of the solvent recovery process in 1991.
Date of Closure:	This unit is active.
Waste Managed:	This unit is used to manage the still bottoms left over from the distillation of the used water/alcohol solution from the presses. Wastes in drums are moved to the drum storage pad (SWMU 8) where they are ultimately picked up by Safety-Kleen Corp.
Release Controls:	This area is located indoors, on a concrete floor, and is diked to prevent spill releases.
History of Documented Releases:	No releases for this unit have been documented.
Observations:	This unit was identified during phone conversations between BVWST and the AGI Technical Analyst after the VSI. Consequently, no observations of the unit were made during the VSI.

4.0 AREAS OF CONCERN

BVWST observed no AOCs during the VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and no AOCs at the AGI facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. Following are BVWST's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the AGI facility and recommended further actions.

SWMU 1 **Waste Paper Collection Area**

Conclusions: A low potential for release to air, soil, ground water, or surface water exists. This unit is located indoors on a concrete floor and contains non-hazardous waste. The area is well contained and has fire precautions.

Recommendations: No further action is recommended.

SWMU 2 **Paper Waste Storage Room**

Conclusions: A low potential for release to air, soil, ground water, or surface water exists. This unit is located indoors on a concrete floor and contains non-hazardous waste. The area is well contained and has fire precautions.

Recommendations: No further action is recommended.

SWMU 3 **Waste Ink Satellite Accumulation Area**

Conclusions: A low potential for release to air, soil, ground water, and surface water exists. This unit is indoors and the drums are covered and rest on a concrete floor. This unit handles only small quantities of waste so that releases would be easily controlled or prevented. However, photograph No. 14 shows open cans of ink on the floor next to the accumulation drum.

Recommendations: BVWST recommends containers of waste be maintained closed.

SWMU 4 **Printing Press Satellite Accumulation Areas**

Conclusions: A low potential for release to air, soil, ground water, and surface water exists at this unit. This unit is indoors on a concrete floor and the drums are covered. This unit handles only small quantities of waste so that releases would be easily controlled or prevented.

Recommendations: No further action is recommended.

SWMU 5 **Press "Washups" Satellite Accumulation Area**

Conclusions: A low potential for release to air, soil, ground water, and surface water exists at this unit. The concrete floor in this area is lower than the rest of the building to ensure that a release would be easily contained. The door to this room is very well secured. However, Photograph No. 7 shows five drums, one of which is open, with used rags lying around. The large number of drums in the unit makes it questionable that full drums are being removed from the unit properly.

Recommendations: BVWST suggests that drums must be closed except when it is necessary to add or remove waste, and that full drums be removed from the unit within three days.

SWMU 6 **Waste Coatings Satellite Accumulation Area**

Conclusions: A low potential for release to air, soil, ground water, and surface water exists at this unit. The drums are kept on a concrete floor and are kept covered. This unit handles only small quantities of waste coating so that releases would be easily controlled or prevented.

Recommendations: No further action is recommended.

SWMU 7 **Waste Glue Satellite Accumulation Area**

Conclusions: A low potential for release to air, soil, ground water, and surface water exists. This unit is on a pallet on a concrete floor and a relatively small amount of waste glue is handled.

Recommendations: No further action is recommended.

SWMU 8 **Drum Storage Pad**

Conclusions: A moderate potential for release to the soil and ground water exists. The drum storage pad is upgradient of the slope that leads to the railroad tracks behind the facility. AGI recently covered and overpacked 26 drums containing an unknown substance. The condition of the drums and length of time they were uncovered are unknown. Because these drums remained outdoors on an uncurbed asphalt pad for an unknown period of time, the possibility of a release to air and surface soil exists.

Recommendations: Soil sampling on the sloping area of the drum storage pad.

Because of the physical constraints of this location, this unit cannot be brought into compliance with 40 CFR Part 265 Subpart I. AGI consultants are preparing a request for a variance to be allowed to store drums in this area.

BVWST recommends that drums be stored in accordance with 40 CFR Part 265 Subpart I, or with an approved variance.

The apparent contradictions between generation rates, quantities on site, and storage periods should be resolved.

SWMU 9 **Still Bottoms Satellite Accumulation Area**

Conclusions: A low potential for release to air, soil, ground water, and surface water exists. This unit is on a diked concrete floor and a relatively small amount of still bottom material is handled.

Recommendations: No further action is recommended.

TABLE 3

SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Recommended Further Action
1. Waste Paper Satellite Collection Area	1980 to present	one	No further action recommended.
2. Paper Waste Storage Room	1980 to present	None	No further action recommended.
3. Waste Ink Satellite Accumulation Area	1980 to present	None	Drums should be stored closed.
4. Printing Press Satellite Accumulation Areas	1980 to present	None	No further action recommended.
5. Press "Washups" Satellite Accumulation Area	May 1980 to present	None	Drums should be stored closed.
6. Waste Coatings Satellite Accumulation Area	May 1981 to present	None	No further action recommended.
7. Waste Glue Satellite Accumulation Area	1980 to present	None	No further action recommended.
8. Drum Storage Pad	1980 to present	None	Soil Sampling. Drums should be stored in accordance with 40 CFR Part 265, Subpart I, or an approved variance. Storage times should be verified.
9. Still Bottom Satellite Accumulation Area	1991 to present	None	No further action recommended.

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ATTACHMENT A

PRELIMINARY ASSESSMENT

FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 047580006

II. SITE NAME AND LOCATION

01 SITE NAME *(Legal, common, or descriptive name of site)*	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER				
AGI, Inc.	1950 North Ruby Street				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Melrose Park	IL	60160	Cook		
09 COORDINATES: LATITUDE	**LONGITUDE**				
41° 54' 30" N	87° 52' 30" W				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*
From Chicago, take 290 West to 1st Avenue. Take 1st Ave. North to North Avenue, At this intersection, make a left (West on North Ave.). Continue on North Avenue for approximately 1 mile to Ruby St. Make a right.

III. RESPONSIBLE PARTIES

01 OWNER *(If known)*	02 STREET *(Business, mailing residential)*		
Ruby North Partnership	1950 North Ruby Street		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Melrose Park	IL	60160	(708) 344-9100
07 OPERATOR *(If known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
AGI, Inc.	1950 North Ruby Street		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Melrose Park	IL	60160	(708) 344-9100

13 TYPE OF OWNERSHIP *(Check one)*
■ A. PRIVATE ☐ B. FEDERAL: _____ (Agency Name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER _____ (Specify) ☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*
☐ A. RCRA 3010 DATE RECEIVED: 08/8/80 (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
■ YES DATE 12/10/91
☐ NO

BY *(Check all that apply)*
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ (Specify)

CONTRACTOR NAME(S): BVWST

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION
■ A. ACTIVE ☐ B. INACTIVE ☐ C.UNKNOWN	1971 (BEGINNING YEAR) N/A (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Hazardous and ignitable wastes from package production.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
Drums of ignitable waste are stored less than 50 feet from the property line.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*	03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA	(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Ramona Reints		BVWST	(312) 346-3775	5/15/92 (MONTH DAY YEAR)

ATTACHMENT B

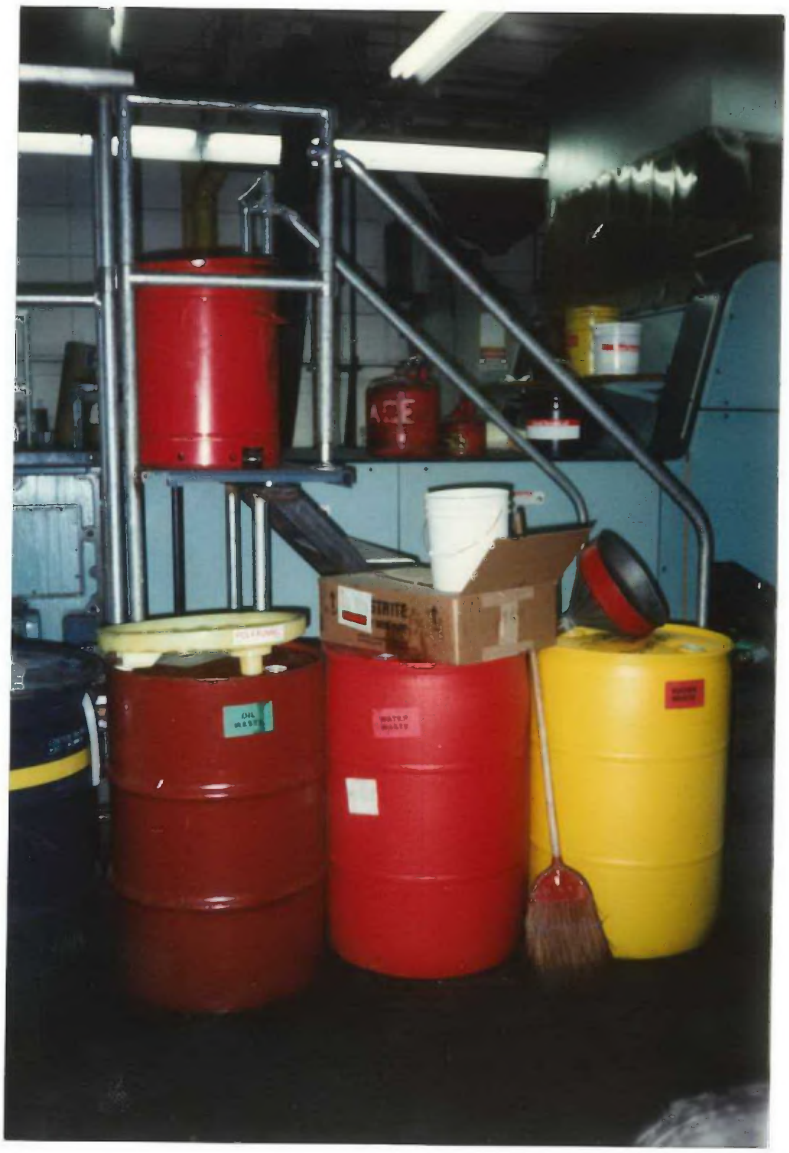
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

AGI, Inc.
1950 N. Ruby Street
Melrose Park, IL 60160
ILD 047 580 006

Date:	December 10, 1991
Facility Representatives:	Dennis McGuinn, Director of Human Resources Tony Emerson, Technical Analyst (708) 344-9100 Stan Wheeler, V.P. of Operations
Inspection Team:	Michael Eng, BVWST Anil Saxena, BVWST
Photographer:	Anil Saxena, BVWST
Weather Conditions:	Sunny and windy, temperature around 45°F.
Summary of Activities:	The visual site inspection (VSI) began with a meeting at 10:00 a.m. The inspection team discussed the purpose of the VSI. Mr. Wheeler described the mechanical aspects of printing and AGI's history. Past and present waste management techniques were reviewed, especially those concerning a recent emphasis on paper waste reduction. This included using recycled paper, recycling waste paper, and distilling waste water. Past and current operations and release history were also discussed. Most of the information was exchanged on a question-and-answer basis. Mr. McGuinn provided the inspection team with copies of documents requested by the inspection team. At 11:00 a.m. Mr. McGuinn and Mr. Emerson gave the inspection team a tour of the facility including the production and solid waste management areas. He also explained the waste generating processes. Photographs were taken of all active SWMUs and related areas. The tour concluded at 1:15 p.m. The inspection team held an exit meeting with Mr. McGuinn, Mr. Emerson, and Mr. Wheeler. The VSI was completed at 1:45 p.m.

Photograph No. 1 Location: SWMU 4
Orientation: North Date: 12/10/91
Description: Satellite accumulation substation for water/alcohol solution at Press 9.
Drums flush with press.



Photograph No. 2
Orientation: South
Description: In press room facing south.
Satellite accumulation substation for water/alcohol solution and oil accumulation waste at Press 11.

Location: SWMU 4
Date: 12/10/91

Photograph No. 3
Orientation: North
Description: Satellite accumulation substation at Press 9 with waste paper being staged to be brought to the bailing.

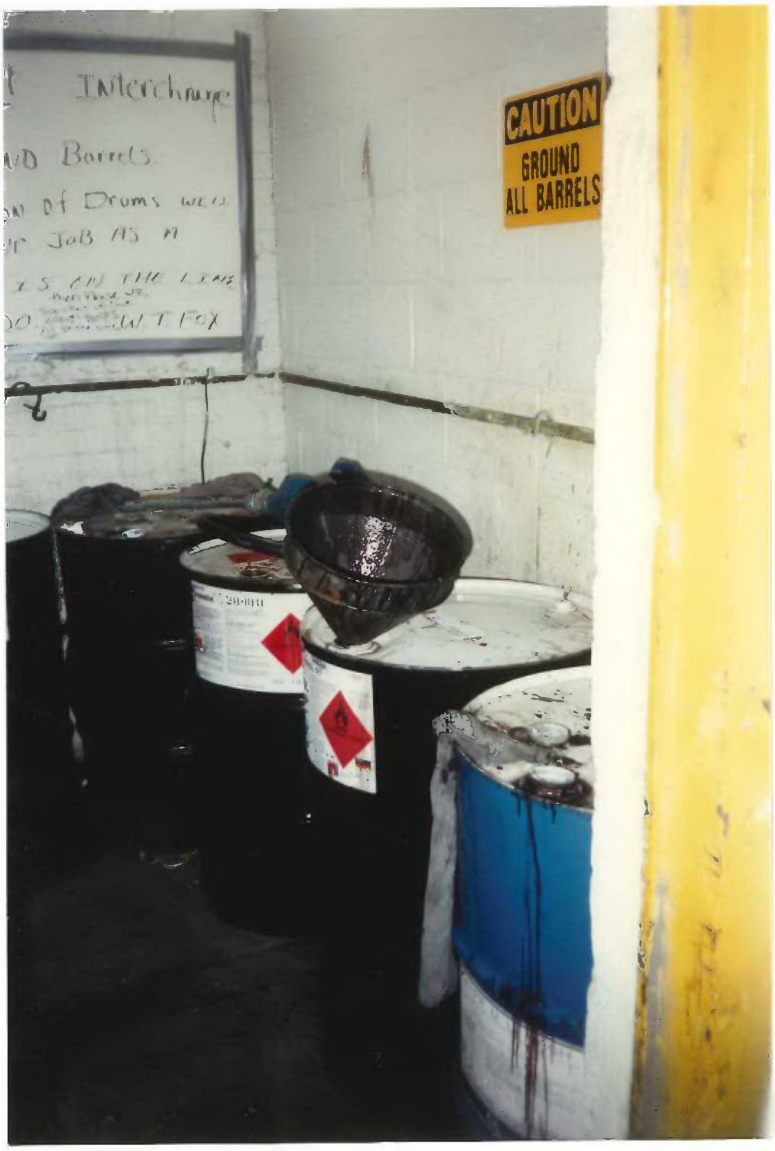
Location: SWMU 4
Date: 12/10/91

Photograph No. 4 Location: SWMU 4
Orientation: South Date: 12/10/91
Description: Lubricating oil being collected in pan (foreground) at base of press. This will be transferred to a drum in the satellite accumulation substation associated with this press, and full drums are moved to SWMU 8.

Photograph No. 5 Location: SWMU 6
Orientation: West Date: 12/10/91
Description: In raw materials storage building, facing drums of UV and water base coating waste.

Photograph No. 6
Orientation: West
Description: A different angle of UV and water-based coating waste.

Location: SWMU 6
Date: 12/10/91



Photograph No. 7 **Location:** SWMU 5
Orientation: West **Date:** 12/10/91
Description: Drum with funnel, half-full, used as area's press 'washup' satellite collection.
Other drums are full and waiting to be taken to the Drum Storage Pad (SWMU 8).

Photograph No. 8 Location: SWMU 8
Orientation: North Date: 12/10/91
Description: Final staging area for all wastes, except paper, to be picked up by Safety-Kleen.

Photograph No. 9 — Location: SWMU 8
Orientation: North — Date: 12/10/91
Description: Facing the final staging area.

Photograph No. 10 — Location: SWMU 8
Orientation: East — Date: 12/10/91
Description: On the Drum Storage Pad (SWMU 8) facing overpack drums of unknown wastes.

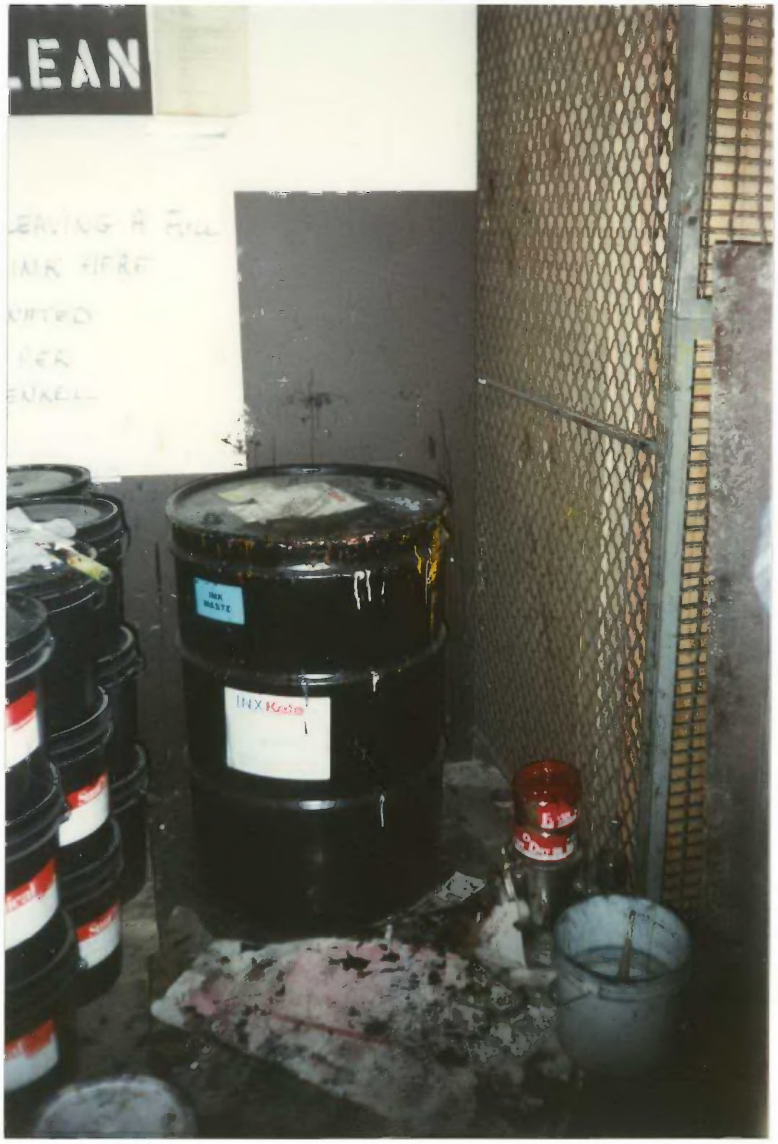
Photograph No. 11 Location: SWMU 1
Orientation: West Date: 12/10/91
Description: In paper stripping room where cartons are cut out of sheets. Paper waste is collected either in the cyclone or on carts to be moved to bailing room.

Photograph No. 12
Orientation: North
Description: In finishing room facing drum for collection of waste glue.

Location: SWMU 7
Date: 12/10/91

Photograph No. 13
Orientation: Southwest
Description: Baled paper in its final staging waiting for resale.

Location: SWMU 2
Date: 12/10/91



Photograph No. 14
Orientation: West
Description: In press room at waste ink satellite accumulation area.

Location: SWMU 3
Date: 12/10/91

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Upon processing of film, it was found that the first picture was a blank. The copied field notes were subsequently changed to reflect the change in numbering. Therefore, picture number 2 in the field notes is now picture 1, 3 is 2, 4 is 3, etc.

Projects (continued)

12/10/91
10:00 am
AGI
1950

(1)

Dennis McGuinn
Director of Human Resources

Tonny Emerson
Record Keeping

Stan Wheeler
V.P. of Operations

produces packaging — record
cosmetics
Folding carton.

5 presses (printing) — sheet fed
1 press — roll fed.

Diecutters —

6 gluers — fold + seal.

---

paperboard.
printing inks
water & alcohol — cleaning press washups.
coatings — high gloss
glue.
lubricating oil.

paper waste

(7)

260,000 sq ft.

360 people

2 shifts.

1991 - thru November
~ 70000 tons paperboard

1971 — began

1958 — Baumgarten Calendar Co.

rented to AGI until they took over the property

(A)

Paper
- sheeted to app size
- printing process
- die cutter
- glue machine

Cyclone ~~bar~~ deposits into bailer in bin

Hogger — shreds sheets of paper into

separate piles of paper by value

sold to one dealer.

~~ATT~~ Atlas Recycling
Chicago, IL
W. Barry St.

8.5 million pounds in 1990

(5)

UV reactive inks
95% — no solvent

from General Printing Inks (GPI)

waste because of extra, unneeded product.

to back dock accumulation areas into 55 gallon drum for ink only.

① Moved to staging area.*

Safety Kleen
Elgin, IL

5% conventional oil based inks handled the same.

(6)

water/ alcohol

Continuous cleaning of printing presses during printing procedure.

periodically emptied when too soiled. ~1 week

Waste Fountain Solution

satellite collection at each press. — ~~Eth~~

Brough to solvent recovery still.

Distilled to fresh. H_2O/ EtOH.

still bottoms collected at room. until full moved to King SWAU

Safety Kleen takes still bottoms Ethylene Glycol + Ink. — major component

(7)

not all H_2O/EtOH goes to still yet – some H_2O/EtOH goes to Kung SWMU in 55 gals.

Press washups –

w/ color change or at end of week

~1 gal per wash.

Solvent based compounds / onto rollers – collected in washup pan

Ink solvent mixture collected in Chemical Storage Room. → 55 gal drum.

Eventually moved out back to King Bldg

→ Safety Kleen

Coatings — raw materials

pumped w/ diaphragm pump

& deposits on blanket which

Xfers it to paper.

Only waste is extra (often w/ additives in it).

Collection station is near raw material storage

Full drums go to RSW MW

& Safety Kleen retrieves

Glue — 30 or 55 gal drums.
+ totes. (~300 gals)
either pumped to glue pot

injected into nozzle & applied to carton. Folds carton + stacks. in cartons.

30 + 55s. pop into pot.

Glue pots are cleaned or form skin on top which is removed

stored satellite collection at finishing room.

Gal drums moved to the bins

Safety Kleen. collects.

(10)

Lube oil —

stored in 5 gal containers on press. Added as needed.

oil is continuously run thru machinery collects in container at bottom

Emptied hourly or so.

collection drum at each press.

full drums to King Shine

for Safety Kleen.

Plate room — all materials are recycled.

Antifreeze — waste coolent used to cool UV lights (used for drying inks)

Not regularly generated.

Put into drums at press + moved to back SWMU

Safety Kleen.

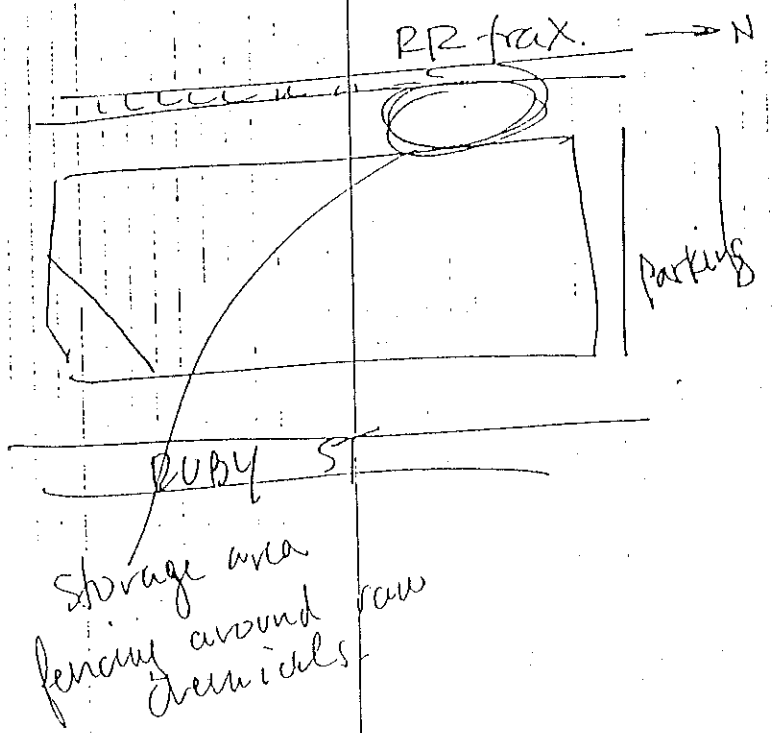
SECURITY

two 12-hour shifts

open 6 days/wk – not Sunday.

No formal security system.

19 doors.



(13)

PERMITS —

Air permit — for all finishing equipment

USTs — fuel oil for boilers. out of service since 1970s.

tanks were filled in November 1991

soil + GW sampling done. results ⊖.

Melrose Park — around here is industrial — no residences in immediate vicinity.

(14)

Rubylith + Mylar.

used in drafting processes.

sheets deposited into 55 gal barrels mylar —

sent for recycling to. DuPont in Niles, IL

~ 4 months — USA
maybe 1 drum/year.

photo 1 + 2
facing North in Press Room at satellite collection area for H_2O / Ethott waste. At Press 9.

photo 3
facing South in Press Room at satellite collection for water + for oil waste Press 11

photo 4 3
facing North in Press Room, Press 9. Paper collection bin for waste paper

photo 5 4
facing North in Press Room, Press 10. Lubricating oil collection at base of press.

photo 6 & 7 facing West in raw materials storage bldg. Drums of UV coating waste.

photo 8 & 7 facing SW in Distillation Room, drum of still bottom

photo 9 facing N in Distillation Room at

photo 9 & 10 facing W in chemical storage room. Press washups satellite collection + drum awaiting xfer to King Sun.

photo 10, 10 facing N at the Pad, all barreled waste stored here pending retrieval by Safety Kleen.

photo 12 11 facing East on fill pad. overpack drums of unknown wastes.

photo 13 12 facing West in paper shipping room. Paper waste is collected either in cyclone or on carts to be moved to central collection.

photo 14 13 facing North in Finishing Room. Satellite collection for Waste Glue.

photo 15 14 facing ~~North~~ West in Baling Room. Bailing Apparatus

photo 16 15 facing South west Bailed paper awaiting resale.

photo 17 16 facing West. In press room at Ink waste storage collection area

(18)

The Pad — 125' x 12'
approximately 300 storage potential.

F.1 Imagery/Special Studies

(1)

UNUSED COATING INVENTORY — NORTH SIDE OF BUILDING

NOV. 1, 1980

(2)

WASTE STORAGE

NW CORNER OF BUILDING

NOV. 1, 1980

(3)

UNUSED ULTRA-VIOLET COATING INVENTORY / SOUTH-CENTRAL AREA OF PLANT

11-11-80

VIEW OF PLANT 11.11.80
FROM NE CORNER FACING W

AGI ON RIGHT HALF OF PHOTO

VIEW OF PLANT 11.11.80
FROM NE CORNER FACING S